



Lessons for EU – viewpoint of EFNCP

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EU policy should be informed by local projects

- The entire “policy-making community” of the EU is quite removed from local realities.
- Local projects often reveal that policy theory and bureaucratic controls are poorly adapted to reality.
- Policy makers should not be tempted to brush aside the complications revealed by local projects.
- The burden of integrating agriculture and environment must not be left to the farmer to resolve alone.



HNV farming in BG and RO faces many challenges, but also some encouraging examples.

- A lot of abandonment already has occurred in some areas. A lot more is likely. What is EU to do about it?
- Small-scale farm systems especially problematic. Not realistic to “fossilise” these landscapes. Is there a vision for the future?
- Market opportunities (e.g. organic) generally taken up by larger, more intensive producers. Very difficult for small, traditional farms.
- But we also saw new HNV farmers taking advantage of abundance of low-cost land, and expectation of CAP support payments.



HNV policy responses in BG and RO are strong compared with EU15

- Transparency and dialogue with NGOs.
- Strong presence of HNV farming in RDP documents.
- Progress made with identification, maps.
- Range of positive support measures (for grazing, mowing, shepherds, orchards).
- Payments set at level to provide real incentive.
- Large areas covered by measures.



But some significant issues to resolve:

- Major gaps in support:
 - Geographical gaps due to targeting
 - Type 2 HNV farmland outside Natura 2000
 - A lot of land falling outside LPIS.
- Inadequate data on land and livestock densities – LPIS needs improvement.
- GAEC and scrub encroachment – danger of negative consequences for biodiversity.
- Common land issues: over-stocking, shepherding, etc.



EU lessons

- Measures for HNV are available in CAP.
- But how much and how well are they used? Who knows? How are RDPs evaluated for their HNV content?
- We see massive imbalances in the effort countries and regions are making for HNV farming.
- Countries doing least for HNV are meanwhile providing more support for competitive, intensive farming. What should BG and RO think of this?
- EU needs to work out a more cohesive common framework for addressing HNV farming commitments:
 - Address “HNV barriers” existing in CAP
 - Guidance on which measures to use and how
 - Allocation of sufficient resources in proportion to needs
 - Information on what each country is doing, or not doing



Maintaining HNV farming

- Commission should make clear that aim is horizontal support for HNV farming systems. NO intention to create designated “HNV areas”.
- Two approaches are needed:
 - Horizontal economic support for the types of farming that have been identified as HNV, such as low-intensity grazing.
 - Local projects to tackle specific problems (economic, agronomic, conservation). For example, small-scale mosaic landscapes. Need Local Action Groups involving farmers. Axis 4?



Lessons concerning CAP measures

- Agri-environment needs clarifying: if it can be used to support existing activities, let everyone know.
- Payment levels: are they enough to maintain the activity? Even for very small farms? And if not?
- Should payments be restricted to geographically defined areas? Is zoning good for biodiversity?
- Afforestation: only for arable land (except specific situations of habitat restoration).
- Axis 1 investment aid: is it really accessible for HNV farmers? Is a special measure needed?
- Get ecology in CAP right: e.g. GAEC and bushes, concept of “permanent grassland”.
- Don't think development of wider, non-farm rural economy is the solution for biodiversity and land management. It is also part of the problem.



LPIS is a key instrument for:

- Identification of HNV farmland,
- Targeting of payments to HNV farmland,
- Monitoring of HNV farmland.
- Relatively small improvements are needed (harmonise grassland types and semi-natural vegetation).
- This should be an EU priority for meeting HNV and biodiversity goals.

