



PLANTA EUROPA RESPONSE TO THE 1ST PUBLIC CONSULTATION ON THE CAP “HEALTH CHECK”

January 11th 2008

Planta Europa is the network of government and non-government organisations that work together to conserve the wild plants and fungi of Europe. The Network was established in 1995 and currently has seventy member organisations from 35 European countries. The work of the Network focuses on the implementation of the Planta Europa and Council of Europe European Strategy for Plant Conservation - a part of and a contribution to the CBD Global Strategy for Plant conservation. Planta Europa is also member of the European Habitats Forum, the NGO network that promotes proper implementation of the EU Habitats and Species Directive.

The Planta Europa Secretariat submits this response on behalf of the members of the Planta Europa Network.

1.2 Cross Compliance

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

Planta Europa believes there should be no weakening of the cross compliance standards, which have brought benefits to the environment across Europe. With regard to the existing standards, Planta Europa would strongly recommend additional GAEC standards be added that further benefit biodiversity, provide additional resource protection as a means of mitigating Climate Change and also assist in mitigating the loss of setaside.

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

Planta Europa believes none of the current legal requirements or GAEC standards should be deleted. We strongly support the addition of GAEC standards under Cross Compliance that include:

- a) Greater protection for permanent grassland to prevent further loss of botanical diversity. Permanent grasslands are some of the most important habitats for plant diversity in Europe, particularly in Central and Eastern Europe, and they are also under significant

threat¹. Permanent grasslands play a significant role in water storage and thus are important in natural flood management²

- b) Protection for all types of field boundaries, ancient woodlands, in-field trees, traditional orchards, and historic environmental features
- c) Amendment of Annex IV of Council Regulations 1782/2003 to assist in connecting and enlarging habitats and thus helping to deliver Article 10 of the EU Habitats and Species Directive and mitigation against impacts of climate change on biodiversity. Fragmentation is a very serious problem especially for grassland habitats.

2.2 Cereals setaside

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

Planta Europa acknowledged in our letter to Commissioner Boel (19/11/07) that although the original purpose of setaside to combat over production is now a redundant issue, setaside has become a crucial haven for plant biodiversity within agricultural ecosystems. We were greatly disappointed with the decision to move directly to a 0% rate of setaside for the 2008 harvest year as this decision pre-empted proper consideration of this issue through the Health Check prior to any damage being done. Setaside should not be abolished without any replacement mechanism.

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

Planta Europa would support the introduction of a mandatory mechanism under cross compliance requiring a percentage of land on all compliant farms to be managed for the interests of biodiversity. This could be creation, restoration or maintenance of existing semi-natural habitat or provision of fallow land (as formerly with rotational setaside).

3.1 Climate change, bio-energy, 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 to address these challenges.

Climate change: Planta Europa considers measures to address climate change are needed under cross compliance (Pillar I) and agri-environment

¹ Anderson, S. Kušik, T. and Radford, E.A. (Eds) 2005, Important Plant Areas in Central and Eastern Europe. Plantlife International

² O'Connell P E, Beven K J, Carney J N, Clements R O, Ewen J, Fowler H, Harris G L, Hollis J, Morris J, O'Donnell G M, Packman J C, Parkin A, Quinn P F, Rose S C, Shepherd M, Tellier S. 2005. *Review of impacts of rural land use and management on flood generation: Impact study report*. Department of Environment, Food and Rural Affairs, Research and Development Technical Report FD2114/TR. Defra Flood Management Division. London. 142pp.

schemes (Pillar II) (see also comments under 2.1c). Funds must be made available for measures to adapt farmland to address the effects of climate change on biodiversity. The provision and conservation of a substantial network of semi-natural habitat of core sites and corridors, enabling increased plant population resilience and landscape permeability is essential. Such measures would provide an opportunity to set the Natura 2000 network and other European initiatives the Pan European Ecological Network and its component Important Plant Areas (IPAs)³ in a landscape conservation context.

Biodiversity: Sufficient funds must remain available for biodiversity protection and enhancement as these have considerable implications for the delivery of ecosystem services and also therefore resource production. “Halting biodiversity decline” must remain a fundamental objective.

Bioenergy: Planta Europa believes biofuel production could become unsustainable both in terms of global gas emissions and land use. High grain prices and the expanding bio-fuel economy are rapidly encouraging increased intensification of arable production, further incentives are not required therefore payments for biofuel production should preferably cease or at least should be more strictly allocated to sustainable production methods.

Water management: See comments under 1.2

3.2 Strengthening rural development

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

Planta Europa fully supports the Commission’s proposal to increase the rate of compulsory modulation and Member States should be encouraged to impose additional voluntary modulation at a higher rate in order to fund Rural Development measures.

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

Planta Europa believes extra funds raised by the increased compulsory modulation should be allocated to support the maintenance of biodiversity in agricultural habitats, to prevent climate change and to support sustainable forestry particularly in biodiversity rich forests. Funds must be increased if requirements to protect HNV farmland and maintain of traditional farming practices are to be successful.

³ Anderson, S. (2002) Identifying Important Plant Areas. Plantlife International, Salisbury, <http://www.plantlife.org.uk/international/plantlife-ipas.html>