

Plantlife International Response to the 1st Public Consultation on the CAP “Health Check”

January 2008

Plantlife International is a charity dedicated exclusively to conserving all forms of plant life in their natural habitats, in the UK, Europe and across the world. The charity has over 10,000 members and owns 23 reserves. Plantlife International is Lead Partner for 77 species under the UK Government’s Biodiversity Initiative. Conservation of these threatened species is delivered through the charity’s *‘Back from the Brink’* species recovery programme, which is jointly funded by Countryside Council for Wales, Natural England, Scottish Natural Heritage, charitable trusts, companies and individuals. It involves its members as volunteers (*Flora Guardians*) in delivering many aspects of this work.

1.2 Cross Compliance

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

Plantlife believes that the current cross compliance standards are minimal and so there should be no weakening of these standards. With the Statutory Management Requirements largely existing law it is the GAEC standards that have the scope to ensure farmers receiving the Single Payment undertake additional environmental management on their land. Plantlife strongly recommends that additional GAEC standards are strengthened to further benefit biodiversity and provide additional resource protection as a means of mitigating Climate Change and also assist in mitigating the loss of setaside (with regard GAEC 12).

Examples of how cross compliance could encompass a wider range of environmental features on farmed land include; protection for all types of field boundaries, ancient woodlands and infield trees.

Unimproved permanent grassland can be of the most botanically important farmed habitats in the EU. The cross compliance standards should provide better protection for permanent grasslands. For example, Plantlife is concerned that further loss of semi-natural grassland is inevitable in the UK unless measures for its protection under GAEC 5 are significantly strengthened. Of particular concern is the threat to small parcels of less than 2 ha which are currently unprotected by cross compliance due to the standard reinforcing the Environmental Impact Assessment (Agriculture) (England/Scotland) (No.2) Regulations 2006.

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

Plantlife would have serious concerns if any of the current Statutory Management Requirements or GAEC standards were deleted. Due to the Single Payment Scheme being EU wide we believe there will be considerable environmental gain in adding to the existing GAEC standards under Cross Compliance. This should include, for example protection for all types of field boundaries, ancient woodlands, infield trees, traditional orchards, and the historic environmental features. Greater protection of permanent grassland is also required along with other semi-natural habitat to prevent further loss of botanical diversity as new Member States intensify under the Single

Payment Scheme. Mitigating the loss of setaside should also be introduced under GAEC to ensure the widespread delivery across Member States (as with setaside).

2.2 Cereals setaside

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

Plantlife acknowledges that the original purpose of setaside to combat over production is now a redundant issue (with a decoupled SPS and increased demand for cereals). However setaside has become a crucial haven for plant biodiversity within agricultural ecosystems. Given the acknowledgement in June 2007 of the *Agricultural Change and Environmental Observatory Programme*¹ that “setaside has provided important environmental benefits” we were disappointed with the decision to move directly to a 0% rate of setaside for the 2008 harvest year. This decision pre-empted the Health Check, where a more considered change in policy could be completed, evaluating alternative mechanisms for environmental protection. The direct move to a 0% setaside rate within the current market of high grain prices has already had serious implication for plant biodiversity, predominantly through the ploughing of permanent setaside and return to production. The programme of research and monitoring of the value of permanent setaside being complete in 2008 would seem rather “too little, too late”.

The value of permanent setaside is the length of time it has been out of production, it takes 10 to 15 years to develop a semi-natural habitat for grassland species therefore if these sites are lost it would take another 15 years to re-establish a similar habitat. Also of significant value was the extent of setaside coverage across the Member States.

An example of where permanent setaside has provided very important semi-natural habitat for plant conservation is 40 hectares of chalk grassland adjacent to Ranscombe Farm Reserve on the North Downs in Kent, which has been setaside for over 10 years, and now has an exceptional flora including the UK BAP species Man Orchid also Pyramidal and Bee Orchid, Salsify, Grass Vetchling and Rockrose. Plantlife is very concerned that the current strong cereal market puts this site and others like it at risk of being returned to production. We believe setaside should not be abolished without any replacement mechanism.

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

Plantlife believes that a new mandatory mechanism should be introduced under cross compliance of SPS that requires a basic percentage of land area to be managed for the interests of plant diversity, resource protection and the maintenance of landscape diversity. This percentage land area could include the creation or maintenance of existing semi-natural habitat (including land that has been established under permanent setaside in the past) or provision of fallow land (to provide the environmental benefits of rotational setaside).

It is believed that with additional management conditions in place, alongside targeting to maximise plant conservation benefit, the environmental gains delivered on, for example the c.370,000 hectares of land setaside in the UK in 2007 could be condensed onto a significantly smaller area. However there is an urgent need for the

¹ Change in the area and distribution of setaside in England and its environmental impacts (June 2007)

identification of high value set-aside and assessment of the amount of land that would be needed on each holding to replicate and enhance the environmental benefits that setaside has provided since its introduction.

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?

Plantlife considers it essential that measures to address climate change are introduced under cross compliance (Pillar I) and agri-environment schemes (Pillar II). However it is also essential that sufficient funds are made available to implement the measures needed to adapt farmland to address the effects of climate change on biodiversity. Such adaptation should include the provision and protection of large areas of semi-natural habitat in order to establish habitats that are resilient to change. Isolated plant populations will be more vulnerable to climate change therefore the provision of corridors to allow species migration is essential. If we don't move quickly to make current vulnerable sites more robust and provide a network of areas that provide similar habitat conditions many plant species will be seriously threatened by the effects of climate change. Plantlife's Important Plant Areas (IPA)² is a key tool in establishing this network.

Plantlife does appreciate that resource protection will be a primary measure to protect against extremes in weather, but it is essential that sufficient funds remain available for protection and enhancement of plant diversity.

Plantlife is very concerned that the rise in grain price teamed with the expanding bio-fuel market will rapidly encourage increased intensification in arable production. Further intensification will increase the threat to arable plants, which are already the most threatened group of plants in the UK. This UK decline in arable species is also reflected across other European countries. Biofuel production could itself become unsustainable both in terms of global gas emissions (crops grown with increase use of chemical inputs) and land use. It is clear that industrial crops no longer require any incentive (due to compulsory energy targets and high prices) and Plantlife urges the EU to cease support payments for biofuel production.

Plantlife is concerned that in the UK the introduction of new climate change objectives into Environmental Stewardship and the increased demands on both Pillar I and Pillar II to provide measure for climate change, bio-energy and water management is resulting in biodiversity becoming a secondary objective. The UK will not meet the internationally agreed objective to "halt biodiversity decline" due to this increased demand on resources. It is essential that additional funds are made available to the Rural Development Programme to ensure that there are sufficient measures to meet all these objectives equally.

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

Plantlife feels it is essential that the Health Check results in more funding becoming available for Rural Development, particularly for the provision of agri-environment schemes across all Member States. Plantlife believes the CAP must evolve to

² Anderson, S. (2002) Identifying Important Plant Areas. Plantlife International, Salisbury, <http://www.plantlife.org.uk/international/plantlife-ipas.html>

support sustainable land management and to address the environmental challenges we are facing.

Plantlife is a member of Wildlife and Countryside Link (Link) and fully supports the *'Beyond the Pillars – Link's Policy Perspective on the Future of the CAP'* document, which sets out Wildlife and Countryside Link's views on the future of land management policy after 2013.

The document describes the need for 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 Link 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.

3.2 Strengthening rural development

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

Plantlife fully supports the Commission's proposal to increase the rate of compulsory modulation. It is essential that additional funds are made available to Pillar II in order to address the new challenges that have been identified. However, we urge that any increase in compulsory modulation rates does no effect the option for some Member States to impose additional voluntary modulation at a higher rate in order to fund Rural Development measures, most importantly agri-environment.

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

Plantlife would like to see all extra funds raised by the increased compulsory modulation rate to be deployed to fund agri-environment measures. This would help with the current financial constraints Member States are facing due to the cut in their expected Rural Development support after the 2005 decision on the Financial Perspectives. Given both the current and new environmental challenges that face Europe's plant communities a substantial increase in funds to agri-environment schemes is required. In order to ensure successful plant conservation gains across Member States it will be essential agri-environment schemes are targeted at traditional farming systems that manage and enhance botanical diversity on Europe's High Nature Value farmland.