Productive EFAs in Finland

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Finland – Heavily forested country

=> forest derogation applied

Source: JRC 2011
Productive EFAs in Finland

- Fallow land: 20,023 ha
- Nitrogen fixing crops: 6,649 ha
- Short rotation coppice: 2 ha
Background for EFA decisions (1/2)

• In addition to the above-mentioned productive EFAs, only landscape features of GAEC applied
• Via EFAs as little as possible new bureaucracy; yet so that environmental objectives are fulfilled:
  – improving biodiversity
  – less fertilisers and pesticides
  – nutrition for insects and birds
Background for EFA decisions (2/2)

- For the sake of simplification, no equivalence and no regional or collective implementation
- If more reasonable to apply certain EFAs via AECM (e.g. catch crops, buffer strips), they have been implemented under AECM and not at all as EFAs
Fallow land

• Time period 1 January - 15 August
• Based on GAEC 4 *(minimum soil cover)* green cover or stubble is required except in duly regulated cases (e.g. preventing weeds that are difficult to destroy)
• In 2015
  – green cover 80 %
  – stubble 9 %
  – black fallow 11 %
Nitrogen fixing crops

- Mainly pea (55 %), broad bean (= faba bean) (38 %) and clover (4 %)
- Time period 30 June - 31 August
- May be harvested but this is not obligatory
- Cultivation area is not limited geographically because the risk of nitrogen leaching is sufficiently restricted by Nitrates Directive and based on certain GAECs and SMRs in CC.
- Fertilisers and pesticides can be used.
Short rotation coppice

- Very little of these cultivated earlier in Finland
- Willow and aspen
- No mineral fertilisers
- Use of plant protection is restricted (only for preventing weeds when the vegetation is established and after 31 August in the year when the vegetation is terminated).
Why not catch crops?

- Part of AECM, also in the previous programming period
- In AECM available in the whole country, in EFA would have been possible only in the areas covered by EFA obligation
- In AECM more flexibility, e.g. not only mixtures
- Simpler in AECM because no weighting factors
Best practices (1/2)

• Keep it as simple as possible!
  – No equivalence (interesting but the final system too complicated)
  – No links to AECM
  – EFAs that are clear and unambiguous so that unintentional non-compliances can be avoided
Best practices (2/2)

- Electronic aid applications
  - 86% in 2015
- Automated check-ups
  - It is possible to declare EFAs only in the areas where EFA obligation exists.
  - Only the accepted crops can be declared as EFA.
  - Before sending the aid application the system informs the farmer if the EFA obligation is not fulfilled.
Proposals for the future (1/2)

• **Fallow land:** Using the vegetation for agricultural purposes should be possible (but not obligatory)
  – Grounds: Better for the environment if vegetation is harvested or grazed; especially in areas located along water bodies where this reduces nutrient leaching. This would also simplify the rules and ease the time pressure of the controllers in the summer.

• **Nitrogen fixing crops:** Mixtures where over 50 % of the weight of the seed mixture is nitrogen fixing crops should be accepted.
  – Grounds: Such mixtures are beneficial for the environment. This change would increase interest in nitrogen fixing crops.
Proposals for the future (2/2)

• **EFA weighting factors:** For nitrogen fixing crops, short rotation coppice, catch crops and green cover this should be 1.
  – Grounds: Factors under 1 cause confusion to farmers.

• **EFA exemption based on grass/fallow/leguminous area:** The 30 ha limit should be abolished.
  – Grounds: The 75 % rule alone would be sufficient for the sake of simplification.

• **EFA rules:** It should be investigated if highly detailed provisions on EFA could be deleted from delegated regulation (EU) No 639/2014 – in line with the subsidiarity principle.

• **Reductions and administrative penalties:** Should be more proportionate and the early warning system should be possible.
Thank you!

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