La Cañada

Newsletter of the European Forum on Nature Conservation and Pastoralism

No 27 Winter 2011
ISSN 1027-2070

Sheep in mountain pasture in Serbia.

Tomasz Pezold

EFNCP response to CAP proposals

Following a series of draft versions that were widely leaked and criticised, the Commission released its legal proposals for the new CAP on 12th October (http://ec.europa.eu/agriculture/cap-post-2013/legal-proposals/index_en.htm).

There are undoubtedly some good aspects to the proposed regulations. In Pillar 1, the move away from the historic payment system of SPS to standardised payments per hectare is a big step in the right direction for the EU15, and potentially favours lower productivity land and thus low-intensity farming. In Pillar 2, there is a welcome emphasis on the need for rural development programmes (RDP) to show clearly how they will deliver a set of EU priorities, where the words HNV farming are still to be found, based on an analysis of what really needs to be done to pursue these priorities.

However, there is also much that is wrong with the proposals from an environmental point of view, and especially for extensive HNV farming systems. For example, there are ways for Member States to avoid major redistributions of Pillar 1 support. Overall, there is far too much emphasis on standardised packages of rules for all farmers, in return for standardised payments, an approach that flies in the face of the great diversity of European farming. We believe that providing targeted incentives for specifically positive farming types, practices and features would be far more efficient.

Major opportunities for better targeting of support to extensive farming types have been missed, under both Pillars. The problems of large areas of actively farmed shrub and tree pastures being excluded from direct payments has not been resolved (yet). Meanwhile, the supposed 'greening' of Pillar 1 is largely ill-conceived, for permanent pastures, in particular, the proposed system offers nothing to protect extensive grasslands and is unlikely to produce any environmental benefits, so it is in danger of becoming just another layer of pointless bureaucracy. Crucially, much now depends on the details of implementing rules and so-called 'delegated acts' to

La Cañada 27

Contents

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be drawn up by the Commission in the coming months.

The Commission's 2011 Consultation Document on CAP reform explicitly recognised many issues which we regard as important, including:

- the large extent of HNV farming systems in the EU;
- the risk of abandonment faced specifically by extensive grasslands;
- that 65% of all EU habitat assessments are unfavourable, and generally habitat types associated with agriculture have a worse conservation status than other types (these are all extensive pastures/meadows).

This explicit highlighting of challenges by the Commission raised hopes that CAP reform would bring positive policy improvements for HNV farming and extensive grasslands especially. An improvement in basic economic support is needed to halt the on-going decline in these land uses, as has been emphasised on several occasions by DG ENV and Environment Commissioner Potočnik, by the EEA and by the main environmental NGOs.

Yet the Commission's published proposals for the CAP offer nothing specific to support HNV farming. There is no mention in the new regulations of the environmental importance of extensive grasslands/pastures and extensive livestock (as highlighted by the EP's Dess report), which make up the majority of HNV farming in Europe, or of the specific socio-economic challenges faced by these farming systems.

In fact, there is nothing concrete in the regulations that can be used to halt the decline of these land uses other than the agri-environment measure that has existed since the 1980s, and the Natural Constraints (previously LFA) measure that has existed since the 1970s. But whether to use these measures to support HNV farming depends on national or regional decisions. There is no steer at the EU level. Crucial opportunities have been missed to introduce EU-level requirements for targeting CAP income support, through a system of top-up payments for HNV farming (or simply for extensive grasslands) under Pillar 1 and under the Natural Constraints measure.

Furthermore, the CAP measures that specifically affect grasslands – permanent pasture definition, cross-compliance, greening criteria – include several aspects that may be directly negative for these farmlands of high nature value.

The attempts at a 'greening package' for Pillar 1 offer potential for environmental benefits only in intensively farmed landscapes, specifically through the proposed 7% ecological focus area, but are of no benefit whatsoever for HNV farming. The EU priority should be to maintain existing biodiversity values where they exist (which is not just in NATURA sites), but as usual the attention is all on intensive farming.

Overall, the draft regulations fail completely to offer improved *targeting* of biodiversity concerns in agriculture, or to establish sufficient resources for this.

The new direct payment system

The new Pillar 1 payment system moves away from the obsolete 'historic' model to a payment per hectare that is equal for all farmland across a region. This should shift support in favour of less intensive farming systems that received less support under the historic model – a very positive move. A distinction is made between a 'basic payment' and the 'greening' payment, but in practice these two elements combine to make up the new direct payment, replacing SPS and SAPS.

The potentially positive outcomes of the new system depend entirely on the future implementing rules and Member State implementation decisions. For example, the question of how regions are delineated by Member States will determine how much redistribution of support takes place. Of course, theoretically the regionalisation could be done in a positive way for HNV farming, for example by defining all semi-natural pastures and meadows as a 'region', with a *higher* payment than other regions, on the grounds of lower economic returns from the market for this land. But the regulation gives considerable flexibility, so that in Spain, for example, there are discussions about making one 'region' for irrigated land, and another 'region' for non-irrigated land, with a higher rate of payment for the irrigated region in order to avoid a redistribution of support in favour of lower yielding systems.

A theme of the reform debate has been how to focus CAP support on 'active' farmers. The proposal is that claimants shall be excluded if the annual amount of direct payments is less than 5% of their total income, or if their agricultural areas are mainly areas naturally kept in a state suitable for grazing or cultivation and they do not carry out on those areas the minimum activity established by Member States.

For many small farms these restrictions will not be a problem, as they do not apply if the direct payment in the previous year was less than €5,000**.** For larger farms, the second criterion raises some concerns for pastures under very extensive use. The outcomes will depend entirely on how Member States define the areas where 'minimum activity' is mandatory and, of course, this minimum activity itself. Potentially, these concepts could work well as a method for excluding land not in active use, but equally they could work very badly. As with so much of the legal proposals, a great deal will depend on the Commission's implementing rules, when they appear. The regulation stresses that the intention is NOT to exclude small, part-time farms. This affirmation that such farms are, indeed, real farming is very welcome.

The new 'permanent grassland' definition

As outlined in previous editions of *La Cañada*, it is also essential to resolve the problem of exclusions from direct payments of extensive pastures due to inappropriate eligibility criteria (shrubs, trees, etc.), otherwise large areas of farmland of high nature value will continue to be excluded from support, and from all the potential good aspects of the new CAP.

For the key HNV farmland type – pastures and meadow – there are some changes from the current CAP definition. Permanent *pasture* is re-named 'permanent *grassland*', presumably to emphasise that the EC, in principle, wants support to go to grass pasture and not to shrubby and woody pasture, a prejudice that seems to be based largely on ignorance of just how important such pastures are in some EU regions. However, a new clause states that non-herbaceous forage *may* be present. This encouraging insertion is spoiled by the caveat that grass must be the predominant vegetation.

This can be interpreted in various ways. On the one hand, the EC seems to be recognising that non-herbaceous forage (shrubs, trees) are used legitimately for grazing (or more correctly, for browsing), which is a step in the right direction. This should encourage Member States who have tended to exclude pastures with shrubs and trees from Direct Payments to change their approach, and to include them in future. Bulgaria, Sweden and Estonia may now be able to bring into Pillar 1 the large of areas of NATURA farmland habitats currently excluded, even though these are genuine farmland in active use by real farmers. Member States that have always included such pastures in the eligible area (France, Spain, UK) might breathe a sigh of relief.

On the other hand, **the EC's insistence that grass should remain predominant has no agronomic or environmental justification.** If it is taken with flexibility, there may be no problems, but if applied strictly this clause could still lead to exclusions of perfectly legitimate pastures, the grazing/browsing of which is important for ecosystem services, for example, heather

moorlands of the UK uplands, or shrub pastures used especially by goats in southern regions of the EU, where grazing plays a vital role in reducing fire risks. The new definition therefore does not remove the present confusion, it simply alters it. A far simpler and more complete solution is to remove the word 'herbaceous' from the current definition completely, as it contributes nothing useful.

In EFNCP's opinion, it is time to get rid of all attempts to define the preferred types of vegetation, numbers of trees, bushes (or blades of grass?) on farmland at the EU level. Such an approach will never reflect the diversity of EU farmland, and will always tend to create problems for farmers and for national administrations. It is also completely unnecessary. The proposed DP regulation rightly establishes that at least a minimum agricultural activity must be carried out for land to be eligible for support (*'carrying out a minimum activity to be established by Member States on agricultural areas naturally kept in a state suitable for grazing or cultivation'*). EFNCP believes that minimum activity should be the basic criterion for determining if a pasture is eligible to receive DP, not whether it is grass, shrub or wood pasture, or whether the proportion of grass is as expected by DG AGRI.

However, the new regulations have muddied this apparently simple approach by introducing a category of land – *'agricultural area considered as mainly areas naturally kept in a state suitable for grazing or cultivation'* – where the minimum activity requirements do not necessarily apply. The Commission has explained this category in discussions by referring to land grazed by deer, for example. This illustrates the confusion caused by trying to define agricultural land by the land cover rather than by its actual use.

Permanent grassland greening component

A total of 30% of the direct payments will now be given for 'greening' measures. Under this mechanism, farmers will be required to maintain the extent of permanent grassland existing on their holding in 2014 (although a 5% decline would be allowed). However, **the above claims concerning carbon and habitat in relation to permanent pasture have absolutely no foundation, given the proposed definition of permanent grasslands**. The farmer who ploughs, reseeds and heavily fertilises a semi-natural permanent grassland - with major release of carbon and destruction of biodiversity - would still comply with the greening measure for permanent grasslands, as long as the parcel stays in grass.

As currently, the proposed definition of permanent grassland includes grass leys of 1-5 years. This means that all of the semi-natural pastures and meadows in the EU could be converted into annual grass leys, with consequent massive carbon release and biodiversity loss, and they would still count as permanent grassland under the CAP. **The cross-compliance and greening package 'control' of the permanent grassland area is rendered meaningless by this definition and the failure to exclude grass leys.**

In addition, there are major discrepancies in the LPIS of many countries, with permanent grasslands wrongly assigned to the temporary grassland or arable codes. This major CAP reform should be adjusting grassland categories, making a clearer division between permanent and temporary grasslands by putting grasslands reseeded at less than six-year intervals into the temporary grassland category. On that basis, inaccuracies in LPIS could be corrected.

The 2014 threshold date is the nail in the coffin of the permanent grassland 'greening' measure. It is an invitation to farmers to plough up permanent pasture over the next two years. But simply changing the date is not a solution to these flaws. The Commission promises that the issue of reseeding permanent pastures will be addressed through future delegated acts.

Other elements of greening

Farmers shall ensure that at least 7% of their eligible hectares, excluding areas under permanent grassland, is an ecological focus area (EFA), such as fallow, terraces, landscape features, buffer strips and afforested areas.

The EFA proposal is positive in principle, although benefits will occur only on intensive farmland. For HNV farmland the measure brings no benefit, as EFA is already far more than 7% on all types of HNV farmland. **EFNCP proposes that a Direct Payment premium should be paid in proportion to EFA above the minimum threshold, as a reward and recognition of the value of these elements and an incentive to keep them.**

An important problem with the Commission's proposals is the counting of afforested land as part of the 7% EFA requirement. Afforestation is a significant threat to remaining patches of semi-natural grassland and policy should be aiming to maintain these patches in their current use, not encouraging their conversion to woodland. This proposal should apply only when the afforested land was previously in arable cropping.

The current wording is made worse by seeming not to include semi-natural grassland as part of EFA – only linear features and land left fallow are mentioned. This could further encourage farmers to plant trees on remaining patches of semi-natural grassland. **Semi-natural grassland should be included explicitly in EFA.**

Land under permanent pasture is not required to have 7% EFA, according to the proposed regulations. This might make sense for permanent grasslands under low-intensity management that are inherently of environmental value, but it makes no sense for permanent pasture as defined in the regulation (see above). Farmland under intensively managed grass should also be required to have 7% EFA.

Another problem is the proposal for organic farms to be exempt from the greening requirements. This proposal shows a worrying lack of knowledge in the Commission about the range of organic farming systems. Whereas in a like-for-like situation, organic farming is generally more favourable for biodiversity than conventional systems, this does not mean that an organic farm automatically retains permanent pasture and EFA, or uses a crop rotation. There are intensive organic

Câmpeneşti, Romania.
Gwyn Jones

systems that retain very little biodiversity value, such as bare-soil horticulture and fruit cropping (e.g. strawberries). **This proposal from the Commission would allow a farmer to convert an area of HNV permanent grassland to intensive organic horticulture, and even to remove all the EFA from the land, while still complying with the greening component.**

Cross-compliance

Under the current GAEC regulations, Member States must design rules to 'ensure a minimum level of maintenance and avoid the deterioration of habitats', including the option to require minimum standards of positive management, such as 'minimum livestock stocking rates and/or appropriate regimes'. This is a good option, and EFNCP has proposed that this optional requirement should become obligatory on Member States under the new CAP. In this way, farmers using extensive grasslands would be encouraged to maintain a minimum of grazing activity.

This would fit well with the recommendation from the European Court of Auditors (2011) that: *GAEC standards should require concrete and regular activities to be carried out by farmers for them to receive the full amount of the aid.*

The current option to 'require minimum standards of positive management' is removed from the new cross-compliance clauses, although similar wording now appears as part of the definition of agricultural activity and thus of basic eligibility for Direct Payments (see above). It will now be up to Member States to define 'minimum activity'. **For permanent pastures, we propose that authorities should include minimum grazing regimes or livestock densities.**

But at the same time, the Commission has removed the crucial requirement to 'avoid the deterioration of habitats'. The requirements on landscape and minimum level of maintenance are now reduced to meaning 'retention of landscape features', whereas the current GAEC requirement to avoid habitat deterioration applies to farmland generally, and in the case of permanent pastures would apply to issues such as over-grazing and under-grazing. The Commission argument is that 'Member States did not use this option', so this is why they are getting rid of it. But the Commission is wrong. Some countries do require a minimum livestock density (e.g. Bulgaria, Spain), and some explicitly require farmers to avoid deterioration of semi-natural farmland, such as species-rich grassland (e.g. UK).

The reality is that Member States were pushed by the GAEC wording to focus on obligatory standards for 'avoiding encroachment of unwanted vegetation on farmland'. This term 'unwanted vegetation' (combined with the term 'herbaceous' in the permanent pasture definition) has been interpreted in some cases as a blanket assumption that the presence of shrubs on permanent pastures constitutes a breach of GAEC. This makes no sense – many Habitats Directive Annex 1 grasslands are by definition mosaics of herbaceous and woody vegetation.

The new draft regulation removes this requirement on 'avoiding unwanted vegetation', thus hopefully avoiding some of the problems of the past rigid application of rules on the presence of shrubs. But it has been replaced with nothing. **By removing the overarching requirement to avoid the deterioration of habitats, the Commission has given up on any attempts to link Direct Payments to the appropriate management of permanent pastures. This is a major step backwards in terms of how the CAP treats permanent pastures of environmental value. And the proposals forbid Member States from having GAEC requirements that are not in the EC regulation, so countries such as the UK will have to remove their current rules on avoiding habitat deterioration.**

The Commission may think that their greening proposal for ecological focus areas somehow replaces the current GAEC theme of avoiding habitat deterioration, but clearly it does not. The greening proposal requires only 7% of a holding to be under EFA, so that any area of semi-natural farmland that is above this threshold and not a linear or point landscape feature (protected by GAEC) would no longer be protected. If it is semi-natural grassland, we have seen already that the permanent pasture greening mechanism is of no use.

In this context, it is worth remembering that the EIA Directive requirements on the deterioration of semi-natural farmland habitats (including semi-natural grasslands) are not included in the cross-compliance SMR (inexplicably) and are applied very weakly in most Member States. There is thus no EU-wide instrument designed to prevent the deterioration due to intensification, inappropriate use or afforestation of semi-natural grasslands. The burden will be carried entirely by agri-environment and NATURA payments.

Coupled payments

The option to use coupled payments is reinforced in the new regulations, recognising that total decoupling was never a good idea, as EFNCP has never tired of pointing out. We believe that coupled payments are very necessary in certain situations for maintaining pastoral systems, especially on common land, transhumant systems and landless graziers in parts of southern and eastern Europe especially. The regulation refers to environmental justifications for these payments, which is a welcome change from earlier drafts, and was proposed by EFNCP. In fact, **we believe that maintaining landscape and habitats, and fire prevention, should be main reasons for these payments. There also should be a requirement for maximum stocking density thresholds as a safeguard against problems of overgrazing**.

Rural development (EAFRD)

For six years, HNV farming has been an EAFRD priority, and many Member States have made progress in identifying and supporting these systems, especially in the past two years. Some of the best initiatives for biodiversity under the current EAFRD have taken place under the HNV farming umbrella, for example the HNV grasslands scheme in Romania. It is positive, therefore, that the priority to support HNV farming is maintained in the EAFRD proposal, although in a slightly changed format.

The new EAFRD regulation requires that the next round of RDPs should include a clear analysis of needs on the ground in relation to the six EU priorities for rural development, with appropriate measures and resources in response to these identified needs. If robustly applied by Member States and the Commission (a big if?), then **any programming region with a significant presence of HNV farming will surely have to include a satisfactory analysis of the needs of these farming types and a suitable response to these needs through the RDP measures**.

Thematic sub-programmes – Article 8

Member States may include thematic sub-programmes within their RDPs, contributing to EU priorities and aimed to address specific needs identified in the programming area. These sub-programmes should combine a range of measures and may pay a higher rate of aid to beneficiaries. **The approach seems ideal for supporting HNV farming systems such as extensive livestock, transhumance or traditional orchards, but unfortunately such themes are not included in the list of suggestions provided.** On the other hand, neither are they excluded, so presumably a Member State could propose such sub-programmes if sufficient justification is given.

Afforestation, agro-forestry, fire prevention – Article 22

Article 22 provides for aid for afforestation, agro-forestry and fire prevention actions, amongst other things. EU-funded affor-

estation has already destroyed millions of hectares of semi-natural grassland and HNV farmland over recent decades in Spain, Portugal and Ireland. Now the problem is appearing in Romania and is starting to compete with the agri-environment scheme for HNV grasslands. There is no robust rationale for promoting farmland afforestation across the EU. Forest is expanding naturally through farmland abandonment. It is grassland habitats that are declining, not forest. There must at least be provisions for preventing afforestation of extensive grasslands, as have been introduced to prevent biofuel crops on 'highly biodiverse grasslands'. More simply, **only arable land and temporary grassland should be eligible for afforestation aid.**

The proposal to allow Direct Payments on afforested land is extremely dangerous for the future of Europe's grassland habitats and should be removed. This gives a powerful incentive to abandon farming activity on extensive pastures and to afforest them instead – farmers thus avoid all the costs, labour and cross-compliance obligations of keeping livestock, but get the same Direct Payment. This will encourage rural depopulation. It is completely incoherent that grazed forest under active farming should be *excluded* from Direct Payments (as currently occurs because of the eligibility criteria for permanent pasture and the infamous '50 trees rule'), while new forest that is NOT grazed (no active farming) can receive Direct Payments. **Afforested land without grazing use should not be eligible for Direct Payments.**

Support for new agro-forestry is a more positive measure, although of quite marginal interest. It is hard to see why the EU is so keen to provide payments for new agro-forestry, when the millions of hectares of existing agro-forestry are seen as questionable beneficiaries of the CAP by EC auditors, because of rules that are prejudiced against trees and shrubs on farmland (although tree nurseries are eligible for Direct Payments, bizarrely...).

The measure for fire prevention actions must refer to grazing as an efficient fire prevention tool, and this approach should be eligible for special support under this measure. DG AGRI seems to be stuck in the old 'engineering' approach to fire prevention, involving mechanical clearing of fire breaks and undergrowth. Modern experts recognise the enormous value of grazing systems as a low-cost prevention tool, and southern Europe is scattered with innovative projects using grazing for fire prevention, but these initiatives are invariably starved of funding.

Xavier Poux

Maintaining pastoralism in landscapes such as this, in the Cévennes, prevents fires and the consequent release of carbon.

Natural Constraints – Article 46

Article 46 revamps the old LFA scheme, but with minimal changes. The categories are still practically the same. The 'specific constraints' category has existed for many years, and in some cases has been used quite well, e.g. to support extensive livestock in areas buffering protected areas in Spain. This category can cover up to 10% of a Member State's territory, which means that, by combining with mountain and other natural constraint areas, it should be possible to cover all areas of HNV farming. But the draft regulation gives no steer towards supporting particular *types* of farming in the designated areas. Simply giving money to farms in broad areas with constraints is *not efficient or effective targeting*. It is the same 'blanket' LFA scheme as always. DG AGRI has talked repeatedly of improved targeting of the CAP, so where are the tools for this under the Natural Constraints measure?

Efficient targeting depends on *farm-level eligibility criteria*, not the broadly defined boundaries of the areas. The draft regulations fail to improve this crude and much-criticised measure. **Provision should be made explicitly for targeting these payments on the basis of farm-level eligibility criteria, for example to steer payments (or make higher payments) to HNV farming types within the defined areas.**

Expenditure on Agri-environment and Natural Constraints measures

These two measures continue to provide the principal opportunities for supporting HNV farming systems through targeted payments, as has been the case for the past 25 years. Environmental NGOs have called for a minimum of 50% of all RDPs to be spent on agri-environment, to ensure that all regions have ambitious programmes of these measures. The Commission proposals are for a minimum of 25% of EAFRD expenditure under each RDP to be on agri-environment and Natural Constraints measures (combined). This can be seen as an improvement on the current requirement for a minimum 25% expenditure on Axis 2, which includes measures such as farmland afforestation that absorbs a significant part of the budget in some countries. But it is still a very low level of ambition, being far below the current expenditure on agri-environment and LFA in many Member States, and probably not requiring an increase in any country.

Co-operation measure – Article 36

This seems to be inspired by the idea of Local Partnership Projects that EFNCP has proposed as an innovative way to address environmental aims through farmers and NGOs working together in RDP-funded projects. We regard this as a very positive measure, with great potential for making a real difference to the future of HNV farming communities at the local level. However, according to the regulation eligible organisations are to be found in 'agriculture and food chain, forestry sector and among other actors'. **Environmental organisations must be mentioned explicitly here, otherwise they are in danger of not being included by national authorities.**

For more information or comments, please contact policy@efncp.org or visit www.efncp.org

HNV farming in the Aran Islands

Patrick McGurn

The mosaic of tiny fields makes management very time consuming.

Off the west coast of Ireland, in the mouth of Galway Bay, lie three enormous slabs of Carboniferous limestone – the Aran islands: Inis Mór (Inish Mor), Inis Meáin (Inishmaan) and Inis Oírr (Inisheer).

A geological extension of the Burren, in Co. Clare, the islands have a long history of settlement, despite their remote location. Monuments from all phases of Irish history are represented on the islands, from the much-visited cliff-top fort of Dún Aengus to Early Christian remains, such as the oratory of Temple Benen and Tighlath Eany.

The island population has been in decline since the potato famine of the 1840s, dropping to 824 on Inis Mór, 247 on Inis Oírr and 154 on Inis Meáin by 2006.

The most striking feature of the islands is the thousands of kilometres of dry-stone walling enclosing a mosaic of small fields. The walls served the purpose of removing loose stone from farmland, and now protect the soil of the treeless islands from wind erosion, as well as offering shelter for livestock from the harsh Atlantic winds. Most of the soil present on the land has been created by generations of farmers bringing sand and seaweed from the shore onto the bare limestone.

In 2000, the area farmed by the 224 producers on the islands was recorded as 3,025ha: an average holding size of 13.5ha, significantly below the Irish national average of 31.4ha. However, over 30% of the farms are smaller than 10ha, and often made up of many separate parcels of land.

The principal farming enterprises on the Aran Islands are single suckler beef and store lamb production. The young stock are sold through dealers to farmers on the mainland for finishing. The islands do have some advantages for cattle production over other parts of Ireland. The mild climate and soil conditions allow cattle to remain outside all year round, eliminating the need for costly cattle housing and associated waste facilities.

The mean January temperature is above 6°C and the heat released from the limestone bedrock enables some grass growth all year around, limiting the need for large amounts of winter fodder, although small amounts of hay are made during the summer on some farms.

A very specialised management system has evolved, with the farm containing summer grazing and winterage land. The winterage is left ungrazed during the summer, to build up a bank of grass to meet the cattle's requirements during the winter. This system can only work with low stocking rates. There were 1,659 cattle and 285 sheep recorded in 2000, which amounts to less than 0.5 LU/ha.

Small patches of arable have always formed part of the island landscape, producing potatoes for the house, rye for thatching and oats for livestock. Seaweed supplies the crops' nutrient needs. The small field size and the shallow soils on the limestone bedrock mean that cropped areas have to be dug and harvested by hand. Because of the high labour requirement, these practices are in steep decline, threatening Aran's unique arable weed flora, such as the cornflower (*Centaurea cyanus*), darnel (*Lolium temulentum*) and bristle oat (*Avena strigosa*).

These agricultural practices have over the years created a High Nature Value (HNV) system containing a mixture of rare Irish and European habitat types. These include orchid-rich calcareous grassland (Corine Biotope 6210), lowland hay meadows (6510), limestone pavement (8240) and machair (21A0). Over 75% of the total land area is designated as a Special Area of Conservation (SAC) under the EU Habitats Directive.

Like the neighbouring Burren, the area represents a meeting point where plants normally characteristic of Arctic-Alpine and Mediterranean-Atlantic communities all grow together near sea level. Taken together, the two areas represent just 1% of the Irish land area but contain 75% of the of the country's entire native flora.

The islands also contain a number of rare plant species, with 18 plant species listed on the Irish Red Data list, three on the Flora Protection Order (1999) and another 12 species proposed for inclusion

Patrick McGurn

Stages in the creation of traditional potato beds ('lazy' beds) – this small-scale arable is all worked by hand.

in a revised Irish Red Data list. One particular plant, purple milk-vetch (*Astragalus danicus*) is found only on Inis Mór and Inis Meáin and nowhere else in Ireland.

They support an interesting and important bird community with a species assemblage of coastal and inland bird species. Overall, the bird life of the islands is considered to be of international significance, owing to the presence of significant numbers of bird species of European conservation importance listed under Annex I of the EU Birds Directive. These include the Arctic tern (*Sterna paradisaea*), little tern (*Sternula albifrons*), Sandwich tern (*Thalasseus sandvicensis*), peregrine falcon (*Falco peregrinus*) and the red-billed chough (*Pyrrhocorax pyrrhocorax*). Of these birds, the chough's survival is particularly dependent on the farming system. It is considered to be a common bird on the Aran Islands, but is on the Amber list of birds of conservation concern in Ireland.

Patrick McGurn

Scrubbing up of *boreens* (lanes) leads to abandonment of fields.

An uncertain future

The future of these valued habitats and species depends on the continuation of the low-intensity agricultural system. However, just as in other parts of Europe, these small, fragmented farms, coupled with low stocking rates, are on a poor economic footing. The resulting changes are affecting the condition of many habitats, leading to an overall loss in biodiversity. In the absence of grazing, open habitats in fields and boreens (narrow lanes) have been invaded by bracken, bramble and other scrub, or become rank, low-diversity grassland, thereby losing most of their conservation value.

The arable area on the Aran Islands has declined not only because of the high labour input required, but also the poor market returns. And the decline in traditional practices, such as growing local rye cultivars for thatching, not only endangers the rare arable weeds and the genetic resource, but also the local knowledge on how to carry out small-scale arable cropping in this difficult environment.

The continuation of low-intensity agriculture on the Aran Islands is not only vital for the survival of these internationally important habitats, but is also important for the tourism industry on the island. Over 200,000 people visit the islands each year to see its stone walls, field structure, boreens, historic monuments and species-rich grasslands. The islands are a classic example of the broad range of ecosystem services that HNV farming can provide.

The Burren faced similar problems, but by working closely with farmers and drawing on their knowledge and skills through the BurrenLIFE project, it was possible to produce a blueprint for farming in the Burren which has led to a CAP scheme specifically for the area. A similar approach is needed for the Aran Islands.

According to official surveys, the present condition of the Natura 2000 habitat types ranges from 'poor' to 'bad'. Therefore, to reach the 2020 targets set by the EU to halt the loss of biodiversity and degradation of ecosystem services will require a targeted approach and measures to address specific challenges. A local partnership is currently drawing up a LIFE application as a first step to emulating the successes of the Burren.

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Transhumant herders unite

In recent years, there have probably been many events, symposiums, conferences, documentaries, articles, papers and books singing the praises of pastoralism, and stating the importance of mobile livestock systems. Much more numerous have been the shepherds and herders across Europe who in the same period have given up their profession and way of life.

The reasons are well documented. If we take the time to ask a shepherd directly, we will get a long and wide-ranging list of obstacles they have to face, from unfair markets and the dictatorship of monopolistic suppliers and retailers, to impossible sanitary regulations, Kafkaesque bureaucracy and blind conservationists. You could summarise such lists quite simply: 'If we were just paid fairly and left to carry on with our work . . .'

Europe's shepherds are managing rare or endangered breeds, living in remote rural areas, producing local foods and gastronomic treasures. Maintaining the ecosystem balance in so many ways, they are now widely recognised as both custodians of high-value natural ecosystems and wild species and as essential for sustaining local economies, rural areas and traditional cultures.

If European countries have one thing in common, it is an elaborate and rich diversity of agroecosystems, shaped as much by the teeth of the livestock over the generations as by the plough. And in that diversity we find common threads – things that unite a shepherd in the Pyrenees with one in the Swiss Alps, or a Hungarian transhumant herder with his counterpart in Extremadura.

So these are, in many ways, the European counterparts of indigenous peoples elsewhere in the world, and, just like them, they live a peripheral existence in the eye of the hurricane.

A minority within a minority, they make up less than 2% of the farming population in many countries; their voice is rarely heard from most farming unions. They are invisible to the general public – the urban European mainstream moves easily and capriciously from idealising a bucolic lost paradise and pastoral myth, to disdain of *real* traditional livestock farmers. They are seen as anachronistic, even backward, inferior, it seems, to the industrial farmer, who does not care about animal welfare, is much more dependent on subsidies,

Tomasz Pezold

Serbian shepherd with his flock.

produces huge volumes of greenhouse gases and brings the BSE crisis on himself and others.

This gulf of understanding is tragically often also there when it comes to potential allies: development NGOs, food-policy researchers, sustainability advocates, anthropologists and environmentalists very often focus on and work on examples of nomadic or pastoralist peoples in exotic parts of the world, but ignore similar issues close at hand in Europe.

Lack of support is making it difficult for shepherds to be organised and united. Overcoming these difficulties requires strong will, but it must be done. The German shepherds who walked in transhumance from Berlin to Brussels (see http://www.bundesverband-schafe.de/Hirtenzug-2010.610.0.html); the UK shepherd fighting the sheep Electronic Identification System imposed for no good reason; the French pastoralists mobilising against mandatory vaccination that decimates their flocks and a Spanish federation of small shepherd associations demanding special consideration outwith the mainstream framework of CAP – they all have something in common. Not just individual issues, but the deeper malaise underlying them. All face a gloomy future; they all believe that there is a future beyond neoliberal globalisation and they are all starting to make their voices heard.

European Shepherds Network

Recently, a number of country organisations have set up a European Shepherds Network (shepherdnet.eu) to advance some of these issues and to liaise also with the wider global herding community through the World Alliance of Mobile Indigenous Pastoralists (WAMIP).

Members of the ESN participate in the relevant DG Agri Advisory Group. The ESN is building alliances with other stakeholders, such as EFNCP, Euronatur or League for Pastoral Peoples. Currently, campaign themes include the need for specific legislation for extensive pastoralism under the CAP, the mandatory use of Electronic Identification for sheep and goats, vaccination against Bluetongue and other diseases, and broader questions of prevention and animal health, as well as the promotion of shepherd schools and local markets.

The link with High Nature Value farming is clear – it's time to work together so that policy breathes new life into transhumance and the communities of *all* the species that depend on it.

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Landmark case backs CAP support for extensive grazing

In Germany, the complete integration of extensively grazed pastures, such as heaths or wetlands, into the agricultural support system is still highly contested. The German Association for Landcare (Deutscher Verband für Landschaftspflege – DVL) is currently working to adjust the Pillar 1 and Pillar 2 of the CAP to incorporate better the needs of farmers practising extensive grazing, aiming to influence the current CAP reform as well as the process of developing the next round of Rural Development Plans in the German federal states.

The DVL is the umbrella organisation for 155 regional landcare associations in Germany. In these associations, farmers, conservationists and politicians work together as equals, and this philosophy underlies the CAP campaign.

An expert group has been set up to bring forward solutions for some current problems facing extensive grazing systems, in particular the integration of extensive grazed grasslands into Pillar 1 of the CAP, establishing a support programme for conservation measures and the adjustment of existing agri-environment schemes.

Agricultural control systems and HNV farming

One of the main problems is that it is very difficult to integrate a lot of HNV farmland into the agricultural control system. The use of satellite imagery does not give a realistic measure of areas where gradients are high. And, according to German authorities at least, the very poor forage on heathlands cannot be 'agricultural land' in the sense of the CAP regulations.

Furthermore, the theoretical requirements of the law and the practicalities of landscape management are often worlds apart. Farmers carrying out conservation grazing frequently risk financial sanctions. In order to guarantee the long-term maintenance of nature reserves with public money, as well as to minimise the risk for practitioners, there is the need for control systems which are adapted to the aims and difficulties of conservation management.

The working group tries to see the issues from the point of view of sceptical auditors. All objections concerning control systems and Cross Compliance have to be taken seriously if graziers are to benefit from Pillars 1 and 2 payments, with minimal administrative effort and without the risk of sanctions.

The efforts of the DVL are backed by the European Court of Justice. In the landmark Niedermair-Schiemann decision of October 2010 (C-61/09), the Court ruled that *all* agricultural areas are eligible for support from direct payments, even where, as in nature reserves, nature conservation and landscape management are the primary management objectives.

Therefore, in future, extensive pastures are explicitly eligible for full agricultural support, because grazing – independent of type and intensity – constitutes an agri-

cultural activity. All member states – in Germany represented by the *Bundeslaender* – should therefore be able to integrate extensive pastures into CAP instruments without the risk of sanctions. This new legal certainty creates the opportunity to further develop support measures for extensive livestock systems. [But see pp1-5, above, Editor]

The policy requirements for Germany are summarised in a policy paper (in English) available at: http://www.lpv.de/publikationen/english-publications.html.

In the course of the next months and years, the exchange of experiences with European partners will be of high importance. The DVL wishes to involve EFNCP and its member network.

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Is greening of the CAP beneficial for biodiversity?

In August 2011, PBL, the Netherlands Environmental Assessment Agency, working in collaboration with Wageningen University & Research Centre, released a report (http://www.pbl.nl/en/publications/2011/greening-the-common-agricultural-policy-impacts-on-farmland-biodiversity-on-an-eu-scale) which models the regional impacts of greening the CAP (based on the EC's November 2010 proposals). The report concludes that greening the CAP will substantially slow down the decline in farmland biodiversity, most notably in intensive farming areas. It also suggests that extensively farmed areas would be well served by such a change.

So far, so good. However, at no point do the authors of the report indicate what type of management conditions they assumed would be put on the permanent grassland condition, or what type of habitats would be included in the (in their case) 5% ecological 'set-aside'. In reality, whether real environmental benefits do arise from any greening of the CAP will depend on how these measures are implemented in practice. For example:

- It is possible to 'maintain' permanent pasture (and see *La Cañada* 26 for a critique of the present definition) without it necessarily having any biodiversity or climate change benefits. It is the way it is 'maintained' that counts.
- Increasing the diversity of crops grown at any one time has the potential to reduce landscape simplification (one of the major drivers of farmland biodiversity decline), but this depends on how 'different crops' are defined. Wheat, barley and oats are all different crops, but growing these three would still result in a largely homogenous cereal landscape.
- Maintaining an ecological focus on 7% of each farm also has the potential to increase landscape heterogeneity, but currently the areas under consideration appear to be largely, if not exclusively, farmland edge habitats. Including some elements that occur within fields would reduce landscape simplification even more, but until the 'biotopes' that are mentioned in the draft CAP reform text are defined in more detail, then it is difficult to judge how useful this measure will be, in practice.

The devil in the detail

It is also a sweeping assumption that creating ecological priority areas will always result in land being taken out of production. It does not in Switzerland, so why should it in the EU's version of 'greening'? In many situations, applying the ecological priority area approach would not necessarily have to involve removing land completely from production, but rather biodiversity benefits could be achieved by simply changing the intensity of management of those areas of the farm. For example, while it would not be feasible (or desirable) to plough or apply nutrients in the buffers established next to watercourses or hedgerows, such buffers would still be open and available for grazing by livestock.

There is no evidence that many of the assumptions that must have been made in the report will actually happen in practice; the devil will be in the detail. We have no information on the latter from the Commission as yet, and hence no way to form a judgement of how good, bad or indifferent the results will be for biodiversity. Indeed, if the current uproar over the greening proposals continues unabated, we may end up with greening that is so watered down as to be meaningless.

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Patrick McGurn

Nature, people and place along the western seaboard – a study tour report

Mike Alexander

Participants discussing grazing issues at Newborough Warren on Anglesey, Wales.

Named after a 6th century saint (Teilou in Breton) who journeyed to both Wales and Brittany and left his mark and that of the things he had faith in, in various places along the western seaboard, the Teilo Project aims to promote a deeper understanding of shared relationships between people, nature and place along the western seaboard of Europe.

Under the leadership of the author (John Rodwell) and Mike Alexander of Natur, the Welsh Institute of Countryside and Conservation Management (www.natur.org.uk), the project began in early November with a visit of an inter-disciplinary group of five Bretons to North Wales.

Based at the Plas Tan y Bwlch Snowdonia National Park centre, and supported by EFNCP as part of its DG Environment work programme, the group spent four days in discussion and excursions to explore how nature and culture are understood in Wales, and to see examples of existing projects which aim to integrate environmental policy and culture.

Layered landscapes and multiple objectives

Starting their visit on Pen y Gogarth (The Great Orme), at Llandudno, gave the Bretons an immediate sense of an ostensibly pastoral landscape, traditionally dependent on stock grazing, but one, like their own, with signs of many past and present human cultures and interactions with nature from the Neolithic onwards. The area has been long treasured for its tourist appeal, and more recently for its rare plant species, vegetation, bird populations and butterflies.

Both on Pen y Gogarth and Uwchmynydd in Llŷn, sites notified for the quality of their oceanic coastal heathland, questions were posed about the viability of appropriate management of the vegetation and integration of objectives for farmers and visitors. On these sites, but more distinctively on Pen y Gogarth, where the matrix of the heath is a suite of calcicolous grasslands of international importance, there is also the tension between managing such short swards for chough (*Pyrrhocorax pyrrhocorax*) and particular foodplants for the silver-studded blue butterfly (*Plebejus argus*), while retaining the ericoids and gorse (*Ulex* spp.). The chough depends both on protected sites, such as Uwchmynydd, and also, in their more dispersed territories, on more vulnerable situations inland.

In Llŷn, dry heath declined in extent by 50% between 1922 and 1988, while wet heath has been almost obliterated by land-use change. Meanwhile, losses to intensive grazing outside notified sites continue, converting the distinctive sub-shrub vegetation to more commonplace grassland.

In many parts of Wales, low-level cliff-top grazing has become increasingly difficult with shifts in the farming economy and the rise of tourism, and surviving stretches of heath are often regarded by farmers now as valueless waste.

Burning, a traditional practice for renewing sub-shrub growth, is seen as unacceptably risky these days (see p. 12) while cutting, though it can generate a novel cheap substitute for bedding straw, can produce different or uncertain results in the regrown heath.

Some approaches integrating nature and culture

On the National Trust (NT) Craflwyn Estate near Beddgelert, there are still, as there were at acquisition in 1951, 51 holdings with 51 families farming 200,000ha of uplands within the Snowdonia National Park.

The keynote in this living landscape is now maximum diverse outputs with minimum inputs and an integration of farming, forestry, nature conservation and tourism. Some 80% of income comes from subsidy, so costs are crucial and global changes have a far reach: recent Australian droughts have resulted in a shortage of milk production, a gap into which New Zealand farmers have now moved, thus creating an opportunity for Welsh lamb to sell at a higher price.

At Hafod y Llan, a complex of two farms stretching across designated land to the summit of Snowdon and including 1,500ha of hill land, up to 80,000 people cross the property each year. The aim here is to develop a sustainable hill-farming model for the 21st century, the farmer, Arwyn Owen, working with an ecologist to make farming economically viable but also to use stocking levels as grazing tools for the mosaic of grasslands, heaths and mires on the open hills. Sheep numbers have been halved to 2,000, 100 native Welsh Black cattle have been introduced and the operation has been converted to an organic system, a commitment that is proving a challenge now that subventions have been reduced.

In the very different sand-dune landscape of Newborough Warren, we saw how Partneriaeth Anifeiliad Pori Ynys Môn (the Anglesey Grazing Animals Partnership) works to link people who have land of wildlife interest with graziers and farmers who have suitable stock to maintain the vegetation and habitats in good condition. Anglesey has more than 3,000ha of coastal grasslands and heaths, dunes and mires, with 60 SSSIs and over 90 other sites of interest, many of them dependent on grazing. There, we met the only close shepherd in Wales (i.e. a herder constantly accompanying the flock).

Crucially, the Anglesey project is substantially dependent on charitable grants and so, despite being one of the most successful schemes in Wales, its

future is uncertain. In fact, a recurring theme of our discussions was the unwillingness of donors to provide funds for continuation of projects after establishment.

Currently, markets for wool are problematic. At Newborough, we saw artist Valerie Neal creating woven rugs for sale. In Hafod y Llan, wool was stacked ready for sale as roof insulation. At Aberdaron, wool insulation forms part of the recyclable packaging used for shipping local shore-crab meat for niche marketing to top restaurants in London.

Belonging and change in the landscape

The open hill country of Snowdonia has been traditionally hefted but we heard that, with recent reductions in the density of sheep, the heafs are becoming in some places less well-defined to the stock themselves and less readily transmitted instinctively via the ewes to newcomers in the flocks.

Talks by Twm Elias (Lecturer at Plas Tan y Bwlch) and Duncan Brown (webmaster of the Welsh country lore website, Llên Natur) opened up for us the richness of the Welsh heritage of nature lore, plant names, place names, farming traditions and weather records, and presented us with a native perspective on relationships between nature and cultural values.

We saw that, in the Welsh landscape, some incomers are certainly unwelcome. At Llyn Dinas, for example, on the Craflwyn Estate, a striking boundary with neighbouring land abundantly colonised by *Rhododendron ponticum* clearly demonstrated how assiduous management has kept this aggressive alien at bay. Elsewhere on the estate, feral goats, which increased in numbers and became more adventurous during the Foot & Mouth epidemic when stock were cleared, are posing a problem for oak and ash regeneration among the woodlands of the NNR. Likewise, on the limestones around Llandudno, holm oak (*Quercus ilex)*, a non-native tree that is thriving in the milder winters of recent years, spawns huge numbers of seedlings that colonise the grasslands notified as of European importance under the Habitats Directive.

In many grasslands in Wales, as elsewhere, even the appearance of native shrubs is seen as a problem for nature conservation. In fact, the statutory definition of 6210 semi-natural dry grasslands on calcareous substrates specifically includes 'scrubland facies', but few EU countries accept the challenge of favourable condition of such swards actually including dynamic mosaics with open scrub (see Rodwell, J *et al.* 2007 *The European Context of British Lowland Grasslands.* JNCC Report No 394; http://www.jncc.defra.gov.uk/page-3922).

As Patrick McGurn pointed out in *La Cañada* 25, cross-compliance rules also aim to prevent encroachment of 'unwanted vegetation'. In the wider Welsh landscape, the intermediate zone of *ffridd* between the *hendre* fields of the valley bottom and the *hafod* summer grazing grounds of the open hills has lost much of its dynamism with the decline of traditional farming, and has shifted from a landscape of sylvipasture to uniformly dense bracken or scrub.

Ecosystem services and values

Having seen a range of cultural activities closely related to the landscape, we heard that in Wales, as in England, discussion documents are revisiting the question of environmental valuations and its expression in policy frames. *Cymru Fyw, A Living Wales – a new framework for our environment, our countryside and our seas* was published by the Welsh Assembly Government last year, and reports on *Natural Capital accounting* and *Economic Tools and Basic Approach to Valuing for Ecosystem Services* are now available.

In December 2011, there will be a report on the effectiveness of current regulatory approaches and a ministerial decision on proposals for a new environmental delivery body. We heard from several Natur members that original optimism that the Welsh Government would put the countryside and its wildlife at the heart of their thinking has been replaced by uncertainty about whether adequate protection will be forthcoming.

Along with providing training for professionals of the environment and wildlife agencies that will effect such delivery and for the NGOs that campaign for and manage the landscape of Wales, Plas Tan y Bwlch, where our discussions were based, raises awareness through the medium of Welsh about such crucial questions of value in nature and their relationships to the cultural inheritance of the country. Young people figure prominently among its visitors – 25 from a South Wales ex-mining community eating breakfast each day with us.

When socio-economic stringencies make us look inward, it is vital to celebrate the natural and cultural heritage that links peoples and landscapes in different parts of Europe. The present Welsh-Breton conversations will be resumed in Brittany in June 2012, and thereafter will draw in participants from western Scotland, Ireland, the Isle of Man, Cornwall and northern Spain and Portugal. Meanwhile, particular collaborations between those who have already met are being set in train, in both scientific and cultural realms.

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Mike Alexander

At Llyn Dinas, in Snowdonia, topics for debate included the management of invasive spieces.

Burning and site condition – a modern dilemma

Sion Brackenbury

Controlled burning being used to manage bracken and scrub on common land on the Gower peninsula, south Wales.

The Gower peninsula in south Wales was designated the first Area of Outstanding Natural Beauty in the UK in 1956. The mixture of beaches, commons, villages and small family farms was recognised as being of national importance.

Key to this landscape are the commons, the large, unenclosed, open spaces of high nature conservation value protected by conservation policy. These commons serve a multitude of uses and are valued for the services which they provide to society from recreation and nature conservation to access and ecosystem services.

The day-to-day management of these commons is vested in the graziers, the custodians who provide essential services to wider society through pastoral agricultural practices. The commons are a fundamental part of traditional agricultural and cultural practice on Gower which can be traced back to the large land owning estates of the 18th century.

Archaeological evidence suggests that the land which is now defined as commons has been occupied since the prehistoric period, with land clearance occurring during the Bronze Age, evidence of which can be seen on the commons today. It is this legacy of interaction between people and the land of Gower which has created the much-protected place we enjoy today.

Decline in grazing of commons

The situation is worrying, however. The number of common land graziers continues to decline. This has been happening over many years, a silent migration away from the commons, in part due to an ageing population of graziers retiring from farming, and in part to the barriers which are discouraging young graziers from learning the practice. There are commons on Gower today that have 118 registered graziers, with only 6 graziers still active on the commons.

This decline has impacted significantly on the management of the commons as there are simply not enough graziers remaining to maintain the commons in good heart, to share management effort and responsibility. This has an effect not only on the commons, but also on the range of functions and services which these landscapes support. The responsibility for management is now in the hands of a few graziers on whom conservation organisations are relying to achieve outcomes for habitat, archaeology, access and recreation, whilst the graziers attempt to maintain agricultural businesses in, what are at best, marginal conditions.

This decline in active graziers and livestock has brought about a visible change in the habitat and agricultural conditions of the commons. There has been a gradual but significant increase in scrub and undesirable species such as bracken (*Pteridium aquilinum*).

To manage this change either requires an on-going and substantial commitment of resources from outside the agricultural sector to safeguard conservation conditions by working with the existing graziers, or we need to accept that the condition of our habitats cannot possibly be sustained. The principal managers are struggling to survive in the face of significant economic challenges, an ageing demographic and a panoply of regulations governing activity across the varying interests on the commons.

Use of burning

A case in point is management by burning. During 2010, the National Trust commissioned an investigation into the factors preventing the appropriate conservation of fen, wet heath and dry heath on a sample of Gower commons. The principal project driver was the 2008 site condition monitoring report for the Gower Commons SAC, which highlighted frequent, large and uncontrolled fires as a key barrier to achieving favourable conditions on lowland wet and dry heathlands.

With the increase in biomass, resulting in part at least from the reduction in grazing activity, the simplest method of regulating the vegetation and encouraging palatable species is to burn. This is subject to the Heather and Grass Burning Regulations which require consideration to be given to habitat and application for consent where commons are within the Natura 2000 series.

The investigation found that large-scale burning is the most cost effective management tool available to the grazier in the absence of higher stocking rates. Common land management requires an investment in time by the grazier as livestock can range widely from the home farm and can be difficult to locate. This problem has worsened with the collapse of the systems of sheepwalks, or hefts, where each individual flock or herd would maintain a particular area of the common. To control this spread of livestock, burning on the common near to the home farm is used to hold the animals on the fresher vegetation. Where time is at a premium, burning of over-dominant vegetation is the lowest cost management tool.

Conflicting regulation

However, overly complex regulation was cited as a barrier to grazing. A single area of common land often has multiple interests; archaeological, habitat, species, access, recreation and agriculture. There is no drawing together of these sometimes conflicting pieces of regulation in a format which enables the grazier to have an overview of the range of interests and the associated regulation. The commoners recognise that the sites are multifaceted and of national importance yet they feel that the agricultural value is often overlooked in this assessment of importance. The feeling of the graziers questioned was that the services they provide to the wider

environment in terms of habitat management, access and food production are not recognised in the wider community.

The result is a vicious spiral – reductions in the number of grazing animals result in further degradation of both the pasture and the features of Community Interest, making grazing even less attractive. All the while the regulatory system seems unable to find a workable solution.

Common land grazing was described by one grazier as 'the hardest place to farm and the easiest to give up'. Cattle may lose condition, are harder to manage, and are at greater risk than within the controlled conditions of a field.

Graziers have over generations developed cross-bred cattle which are well suited to the harsh conditions of the common and are accustomed to people and disturbance. As graziers withdraw from the commons these herds are being lost. This has implications for habitat management. In the future, from where will it be possible to source commons cattle of the correct temperament and type, which can survive on commons? Simply purchasing cattle from a livestock market for such conditions is not an option. They are as important as the habitat in which they live. Common land cattle are far more subtle and sustainable managers of the common than mechanical intervention to achieve outcomes for habitat and access.

Siôn Brackenbury

Rhossili Down on the Gower peninsula, south Wales, in full flower

Future of commoning in the balance

Extensive livestock management on the commons of Gower is economically marginal and its viability hangs on the presence of support through the Single Payment Scheme (SPS), agri-environment funding, and external funding targeted towards achieving specific conservation outcomes.

Graziers feel that the change in agricultural support from 2013 onwards will require them to consider whether it remains possible to continue grazing the commons. An increase in demand for domestic food production may tip the economic scales toward the use of marginal common land for pastoral agriculture. Timing is however crucial as this will require the people with the skills and understanding to enable this. Common land grazing is a stand-alone practice separate from conventional livestock farming requiring a different understanding, and the skills and knowledge to produce livestock successfully in marginal conditions.

Tradition on Gower is clearly a strong behavioural driver. Gower's commons have been traditionally managed through a combination of cutting, grazing and burning. There is a need to ensure the continuity of this management as a culturally distinctive way of life which is part of the Gower peninsula. With the current dearth of younger graziers taking on the management of the commons, there is a need to review policy and reduce the barriers, in order to encourage more of them to take on this type of farming enterprise.

So what can be done? In the short term there is a need to improve communication and the ways in which conservation messages are conveyed. Fundamental to this is the fact that graziers are as concerned about the loss of wildlife as witnessed from generation to generation, as those organisations whose principal aim is wildlife protection. There is a need to understand, value, and build better working relationships from this.

A cooperative model

On the issue of burning, improved communication, access to information and bridging the gap between regulation and practice are essential. By working cooperatively with the Mid and West Wales Fire and Rescue Service, The National Trust, Countryside Council for Wales, Gower Commoners Association and Commons Vision Ltd., a fire control subgroup has been formed. The purpose of the group is to enable an open and frank dialogue with the graziers of Gower and to assist them, when required, in planning and undertaking (managing?) fires which benefit agricultural production and achieve habitat outcomes. This includes the preparation of fire plans, applications for statutory consents on Natura 2000 sites, and mapping the commons using GPS units provided by the Fire Service.

This cooperative model has proved successful to date in overcoming barriers to regulated burns. As well as creating opportunities for positive constructive dialogue and the building of stronger working relationships, the adoption of a partnership approach to the control of fires and the wider management of the commons is the first step towards safeguarding the commons and all they entail for the future.

At this moment, pastoral agriculture on Gower and in Wales is at a pivotal point. The people with the skills, ability and knowledge to manage commons are declining. In 20 years or less, we will have a situation where we are struggling to find willing graziers and suitable livestock for the commons of Gower. Now is the time for change, whilst the knowledge and skill base remain. If we value our habitats and species we should equally value those individuals whose stewardship over generations has enabled the diversity of habitats and landscapes we have today.

Through organisations such as the Welsh Commons Forum and UK Foundation for Common Land there is the opportunity for the voice of the common land grazier to be heard. Now is the time to act to enable the culture, tradition and practice of pastoral commoning to continue for the next generation and for what it brings to society at large.

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Curbing livestock emissions: how do national targets operate within a European strategy?

Bill Grayson

Late-season pastures like this, in the Pennines, contain higher concentrations of the plant fibres that stimulate the rumen bacteria to produce more methane. These animals grow much more slowly than intensively reared stock, and, each one taking two or three times longer to fatten, produce more methane over the course of their lifetime.

The European Union aims to achieve a 20% reduction in greenhouse gas emissions (GHG) by 2020 relative to the levels in 1990. Responsibilities for delivering this target are not shared equally amongst Member States (MS) as set out in the EU 2020 Plan; the larger economies of western Europe are required to shoulder the biggest part of the burden. The United Kingdom's assigned target is an overall reduction of 16% in its emissions but like all other MSs it is free to choose how it apportions the burden amongst the various sectors of its economy. This process is made more complicated for the UK because responsibility for much of the strategy resides with the four home nations.

Table 1 GHG emissions from English beef and sheep systems operating at different altitudes. (from *Testing the water; the English sheep and beef production environmental roadmap-phase 2*. EBLEX 2010)

	Environmental impact (GWP_{100})	
	kg CO_2 eq/kg liveweight Average	kg CO_2 eq/kg liveweight Range
Lowland suckler beef	19.22	11.26 – 26.89
Upland suckler beef	15.66	8.83 – 20.60

Table 1a English beef production system footprints

	Environmental impact (GWP_{100})	
	kg CO_2 eq/kg liveweight Average	kg CO_2 eq/kg liveweight Range
Hill flocks	13.61	8.55 – 19.22
Upland flocks	11.05	9.40 – 13.56
Lowland flocks	11.08	9.57 – 12.87

Table 1b English sheep production system footprints

The EBLEX Roadmap

In England, DEFRA has adopted a voluntary approach, aiming to persuade farmers to reduce emissions from grazing livestock by 11% in 2020 compared with 1990 levels. This initiative is being spearheaded by the English Beef and Lamb Executive (EBLEX), which is a Non Departmental Government Body funded from a statutory levy payable on all lambs and cattle exported from or slaughtered in England. Although operating at 'arm's length' from government, EBLEX liaises closely with DEFRA in fulfilling its main function of

enhancing the competitiveness and efficiency of the English red meat sector. EBLEX has brought together representatives from the major players within the livestock industry to oversee this process of implementing GHG mitigation. This has resulted in the production of a 'Roadmap', intended to show farmers the best ways for reducing the GHG emissions from their enterprises and encourage adoption of the recommended practices.

As a beef producer in England, I was already aware of increasing levels of public concern and media attention regarding the damage that livestock farming could be doing to global climate systems and was therefore keen to learn what actions I might be expected to take in order to lessen this impact. It came as little surprise to read in both Phases 1 and 2 of EBLEX's Roadmap that the recommendations for English beef and sheep farmers to reduce their emissions are all based on improving productive performance and maximising output efficiency, a familiar message that chimes nicely with EBLEX's main remit. This message was reinforced by graphs showing the positive relationship between 'environmental' and economic performance, along with tables of data showing emissions from various categories of livestock system. The data in Phase 2 had been collected on-farm, demonstrating its validity for the real world of livestock production; it is based on a 'Life Cycle Assessment ' (LCA) calculator that had been PAS 2050 accredited, another compelling measure of its integrity.

But despite its robust credentials and confident style, I was surprised to find that Phase 2 of the Roadmap, contained some striking anomalies, inconsistencies in the data that are not referred to in the reports headline conclusions, nor explained within the text. Informed readers must have been surprised to learn that emissions from upland suckler beef systems were found to be 19% lower than the equivalent figure for lowland sucklers (see tables opposite), a result that could not be predicted from the report's main conclusion that it is the more extensive systems that generate the highest GHG emissions. Phase 2 also shows that upland lamb generates lower emissions than lamb produced in the lowlands, although the difference here is much smaller than for suckler beef. Again this is at odds with the Roadmap's confident assertion that emissions are directly related to degree of extensification. Both these sets of results require clarification, given the host of productive advantages that allow lowland enterprises to operate at higher intensities, advantages in terms of climate and soil type that should, according to the Roadmap's central thesis, all help to reduce emissions by enhancing nutritional parameters and animal performance.

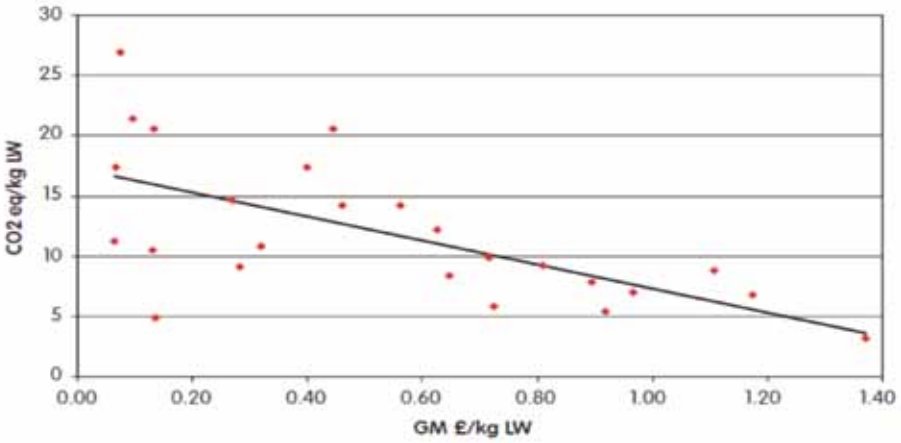

Figure 1a Relationship between beef environmental and economic performance.

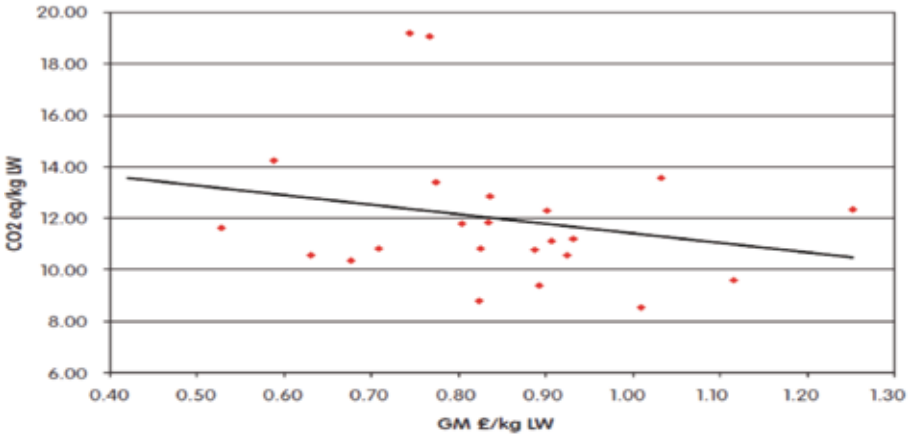

Figure 1b Relationship between sheep environmental and economic performance. (from *Testing the water; the English sheep and beef production environmental roadmap-phase 2.* EBLEX 2010)

Author's notes: 1 GHG emissions mitigation is used here as a metaphor for environmental performance in total. 2 There is no statistical confirmation that these correlations are significant; the one for sheep quite clearly is not.

Further research

Having read the Roadmap's 2nd phase soon after its release in 2010, I felt sure that it would be quickly called to task by representatives from across the environmental lobby, anxious to correct any misapprehensions about the emissions from extensive systems that deliver such a wide range of important environmental goods. When, after a few weeks, I failed to detect any public outcry, I decided to contact EBLEX myself to ask about the discrepancies between the data and the conclusions they derived from them. I was assured that they were aware of the anomalies but attributed them to the small size of the samples (15 upland and 15 lowland farms for both sheep and beef assessments) and would be publishing a 3rd Phase of the Roadmap later in 2011 which would be based on a much larger sample of farms. However, they would not provide me with full details of the C-tool used for Phase 2 because it was 'commercially confidential', although they were able to put me in touch with the consultancy firm 'E-CO_2' that had developed it.

I subsequently commissioned E-CO_2 to undertake an assessment of my upland livestock operation, partly to give me an initial insight into my own performance but also to provide me with an estimate from a source that I knew and understood, making it easier to interpret the values reported in the Roadmap. I was somewhat surprised then to find that my emissions figure, at 20.6 kg CO_2 eq/kg LW beef, although in the upper portion of the range of values reported in the Roadmap is by no means the worst. I say surprised because ours is an ultra-extensive system, based on an overall stocking rate of less than 0.1 LU/ha, with the cattle grazing mostly on unimproved pastures that extend up to an altitude of almost 400m, and generally taking more than four years to finish properly. Most of the cattle are out-wintered on deferred grazing, pasture of such low feed-value that growth rates are almost nothing for four months each year. In short, this system represents the direct antithesis of everything that the Roadmap recommends, and should, if all its assumptions

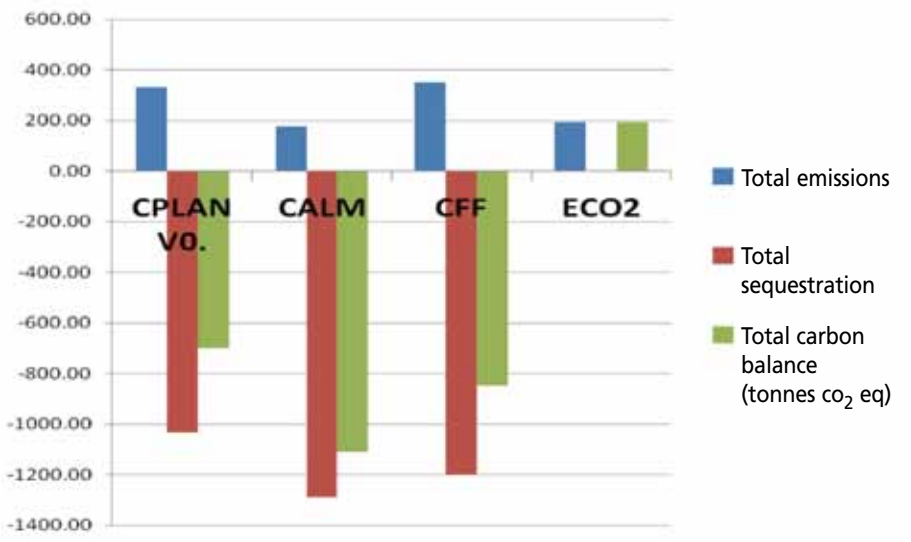

Figure 2 Comparative assessment of one farm's total C-budget (t CO2-eq) using four different calculators: C-Plan, CALM, Carbon Friendly Food and E-CO2 (unpublished data courtesy Soil Association)

are correct, generate a quantity of emissions that is completely off the scale.

I have shared this information with staff at EBLEX, leading to some interesting exchanges that involved different personnel and formats. But despite some quite open discussions, they were not convinced of the need to release the full detail of the Roadmap's workings for public scrutiny. This is not what I would hope for in a strategy document that depends for its ultimate success on its ability to inspire widespread support. EBLEX, it must be said, sounds very confident that its conclusions will gain further credibility as further data is added, helping to gather the necessary support for its findings from its levy-paying, farmer members .

Whilst, at a personal level, I am genuinely concerned about climate change and only hope to assist in the process of promoting best practice for farmers wishing to mitigate the impact of their own activities, I very much feel that the advice given must be sound. And the only way to ensure that the advice will result in genuine reductions in livestock emissions is to subject it to full scientific scrutiny and peer-review.

Perhaps the thing that worries me most about the Roadmap's anomalous conclusions is the eager support its call for further intensification has gathered from the major players in the English livestock industry, support which risks it sidestepping the kind of checks that are needed in order to fully validate its recommendations. The Roadmap's attempts to link emissions reductions with improved economic performance carry an immediate and obvious appeal for sector representatives who clearly see the drive for productive efficiency as a win:win option. But without all of the background statistics these claims are hard to verify and in any case, restricting the measures of environmental and economic performance to GHG emissions and gross margins respectively is worryingly simplistic. The use of the term 'environmental performance' to indicate emissions reduction is particularly concerning as it risks excluding all the other interactions that collectively determine whether a practice is sustainable or not. The inconsistencies in the Roadmap's findings suggest to me that the reality is likely to be much more complicated than the report's conclusions thus far would have us believe. This creates a very real risk of throwing the whole environmental baby out with the water of climate concern.

C-assessment process

Needing to find out more about the whole C-assessment process, I contacted my organic certification body, the Soil Association, who are running a project to compare a number of C-assessment tools, all of which are freely available to farmers wanting to assess their own emissions performance. I therefore offered to provide them with my own raw data in order to see how the results from the Roadmap's E-CO_2 calculator compare with those generated by the other tools in their survey. The five on-line tools that the Soil Association had selected for this study were all slightly different in overall approach and in the algorithm values used to convert on-farm quantities to emissions values. All of them, however, unlike E-CO_2, included estimates of C- sequestration from different sources. Growth of woods and hedges together with soil development processes all combine to form that part of the 'land-use, land-use change and forestry' (LULUCF) component of DEFRA's National GHG Inventory.

Although they constitute a separately accounted component within the inventory, in reality these natural assets comprise livestock farming's living infrastructure and the two clearly ought not to be compartmentalised. Including these processes makes a vast difference to the results; all of the assessments generated by the five free calculators were negative, indicating that my system, as a whole, is a very helpful carbon sink, removing as much as 1100 kg of CO_2 for every hectare of land grazed, as opposed to the somewhat damaging source indicated by the E- CO_2 result.

This begs the question of which of all the available C-assessment tools would be the correct one for informing and monitoring progress within any nationally agreed strategy for mitigating livestock emissions. Clearly the process can only succeed if its progress is founded upon a single protocol consistently applied across all participating units. I, and probably most livestock farmers with pastoralist tendencies would prefer the process not to be based on tools like E-CO_2 that fail to take account of the sequestration, which can, if my own example is representative, outweigh the emissions from the animals themselves.

Such contradictions call for genuine leadership if the Roadmap process is ever to develop the integrity and authority needed to inform and inspire farmers to make the right choices for cutting their emissions. The solutions are unlikely to ever be a 'one-size fits all' solution and, whilst improving productive efficiency, may help reduce overall GHG-emissions in some situations, in others it will probably make matters worse by undermining the less obvious processes that are continually removing carbon from the air.

European Comission study on GHGs

At the moment, however, there are very few authoritatively signposted routes to direct farmers towards making genuine reductions in their C-budgets. Each Member State, whilst responsible for delivering its own overall mitigation targets is free to give whatever emphasis it deems appropriate to agriculture's role, using whatever directives for action it chooses. Some useful work in providing more of an overview of GHG-mitigation across the 27 member states of the EU has been done by the Joint Research Council (JRC) of the European Commission as part of its 'Evaluation of the Livestock Sector's contribution to European Greenhouse Gas emissions' project (GGELS).

This is huge study reviewing the full range of livestock production systems in the EU and their impacts. It is built around a more comprehensive approach to

C-assessment, the CAPRI model (Common Agricultural Policy Regional Impact) that affords a more holistic perspective. One of the most helpful aspects of CAPRI is the emphasis it gives to calculating *net* GHG emissions rather than focussing only on output, recognizing the fundamental relationship between the emissions generated directly by farming activities and the capacity of the land to neutralize those emissions when 'appropriate' farming methods are implemented. Particular importance is attached in the GGELS analysis to the role of grassland as a reliable C-sink wherever it is managed appropriately. *'The approach relies on the finding that C-sequestration in natural grasslands has no saturation effect but is continually accumulating carbon in grassland soils. Management of grassland, if not over-used, can enhance the C-sequestration rate....'*. This more holistic approach, if adopted in the EBLEX Roadmap would fundamentally alter its methodology and its conclusions, ensuring that it focused on achieving genuine reductions in GHG emissions rather than further jeopardizing the land's natural capacity for C-sequestration.

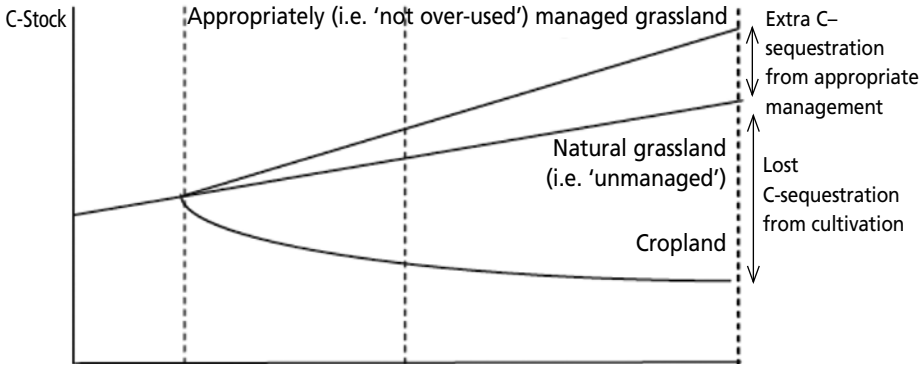

Figure 3 Schematic illustration showing how the elevated C-sequestration properties associated with properly managed grassland are treated within the CAPRI assessment (from *Evaluation of the livestock sector's contribution to EU greenhouse gas emissions –GGELS.* EC Joint Research Council 2010)

Future concerns

The debate regarding EBLEX's Roadmap process may have implications elsewhere within the wider political framework of the EU. The Commission's recent proposal for reform of the CAP contained the following statement stipulating that Member States 'have to spend a minimum of 25% of the total contribution from the EAFRD to each rural development programme for climate change mitigation and adaptation and land management'. This suggests that emissions-reduction and land-use are already being bracketed together in a way that reflects the approach adopted in EBLEX's Roadmap and could result in the two competing against each other for a limited funding budget.

At a time when many of the original agri-environment agreements here in England are coming to the end of their term, many of the farmers affected will be looking to enter new agreements that will secure the viability of their business for the medium term. The future of large areas of less productive grassland could be at stake, with a sudden surge of applicants competing for the more financially-rewarding conservation-based, agri-environment options, but with the limited funds only allowing the most ecologically valuable sites to be accepted. The unlucky ones may find, however, that other alternatives become available through Pillar 2 schemes and that these new options, aimed at lowering emissions by enhancing productive performance, may actually sit more comfortably with their underlying farming perspectives.

The very real danger of continuing to see the climate debate through LCA-based approaches is that it will, in a world growing increasingly concerned for global food security, always be easy to sell a message to farmers and policy makers that increases in productive intensity can be equated to an improved 'environmental' performance.

This would, however, risk weakening support for high nature value systems under the EAFRD extensification and other agri-environment measures, forcing them to compete with the new goal of improving production efficiency, if it ever becomes the one preferred method for mitigating livestock emissions. The systems producing the best *net* performance could, as a result, inadvertently be cast aside as the least carbon efficient!

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Do not intensify the livestock sector too quickly – a comment on Bill Grayson's article

Bill Grayson's article is very timely. As he points out, climate change is proposed to be an objective in its own right in the next EAFRD, as if there was a need to complement 'environmental' goals with one for 'climate change'.

Bill's analysis clearly shows what many agri-environmentalists have noticed for some time: that intensive efficient agriculture is increasingly presented as *the* way to address environmental issues. In France, for example, the ambiguous concept of 'ecological intensification' captures this idea.

There is then an urgent need to cast some light on the debate – are we in fact facing a choice between climate change and biodiversity?

It's an important question! If there is indeed a choice to be made, it is truly a very unbalanced one: everyone would clearly see the cost of climate change, with the potential of more floods, hurricanes, drought, while the loss of some rare flowers in a meadow will be clearly somewhat less of an immediate threat to lives and livelihoods. Who, in all honesty, would be stupid enough to fight for flowers and insects while the house is burning?

In this context, Bill's journey across the world of LCAs leads him to what I find a rather optimistic conclusion: the C-storage capacity of permanent grasslands is found to be high enough to compensate for GHG-emissions from inefficient animals. To quote, '*the [key] finding [is] that C-sequestration in natural grasslands has no saturation effect but is continually accumulating carbon in grassland soils'*.

'Omitting' to count this C-storage capacity in the method used by E-CO_2, in this case under contract to EBLEX, is made all the more regrettable by the lack of transparency when it comes to all the details of the methodology.

Bill actually gives us a good example of how the vested interests of intensive farming choose methods that 'objectively' deliver what they want to achieve – and the need for opacity when the methods are obviously not strong enough.

There will undoubtedly be heated discussions between experts who favour the various different methods, but one


Koen De Rijck

Dairy cattle at Mont Lozère, the Cévennes, France.

must feel some optimism that the methods that account for C-sequestration in the soils will prove their superiority. Bill reminds us that when using LCA, the limits of the studied systems are of paramount importance; in the EBLEX case, not considering the soil box is a major (though standard) omission.

From this perspective, the French situation appears much more favourable, with both the Ministry of Agriculture and the *Institut de l'élevage* (roughly corresponding to EBLEX) much more in favour of extensive livestock systems whose importance to the French landscape – both literally and metaphorically – is clear.

Studies about climate change show that this C-sequestration effect is such that the amounts of GHG per kg of milk or meat produced are equivalent when comparing intensive and extensive farming systems. Furthermore, the French analysis puts permanent grassland at the heart of its recommendations, arguing against systems dependent on crops and imported proteins. French bodies do not see grain-based intensive livestock as the 'answer' to climate change.

Nevertheless, concerns might arise from the second half of the sentence quoted by Bill: '*Management of grassland, if not over-used, can enhance the C-sequestration rate...*' I am not able to assess when the 'over-use' starts from, but I doubt it meets the requirements for semi-natural vegetation. While the competitors for HNV livestock systems are thus not crop-based, they might be efficient grassland ones.

Indeed, from a greenhouse gas emission perspective, a system where animals are kept indoors, where methane and manure are under control, and are fed from 'managed' permanent grassland, would appear to be unbeatable, at least if its C-storage capacity is higher than that of extensive permanent grassland.

I am afraid that from a strict climate change mitigation point of view, the best option is to develop efficient grass-based zero-grazing systems in the lowlands – even better if it means conversion from cropland into grassland – and to afforest Bill's uplands. Money from Pillar 2 could be justified for this cause. The opposite — afforestation of lowlands and improvement of uplands — would make sense as well, but would probably not be efficient enough for the volumes of meat/milk delivered.

Calculating the real costs

So, having apparently plucked defeat from the jaws of victory, what arguments can we now deploy on behalf of the extensive farmer?

First we should point out the need to take into account *all* the GHG costs of these intensively-managed grassland system, including those of the transition period — taken together, what is the effect on net carbon release?

The transition would entail structural changes, such as building new livestock housing and making heavier tractors for silage and hay-cutting requires energy and industrial processes that are costly in terms of GHG emissions. Such transition costs are rarely counted, but one should have in mind that it is often more efficient to keep an old polluting car as long as possible as it is to buy a brand new efficient one. The final balance might be preferable, but the cost of the journey could be too high; in general, the sooner the *net* savings in GHG emissions are made, the better.

Secondly, we must insist on a clear understanding of what is at play when comparing extensive and intensive livestock. Just as we insisted in the case of LCA, that there must be a holistic approach.

When the extensive livestock sector is attacked by the intensive, the latter implicitly portrays itself as single system with one GHG profile. As we have already noted, there is, when seen from a GHG emission perspective, a huge difference between the intensive grassland system outlined above and a grain/imported protein crop-based system (albeit one which possibly has some intensive grassland as part of its forage resources), which is indeed the dominant model of the EU intensive sector.

The climate change advantage of intensifying towards grassland not so obvious when counting the land-use change that it entails. If the future is to be more intensive (more like our most intensive present-day systems in fact – there is no need to reinvent the wheel!), it implies the extension of grassland onto cropland in Europe and deforestation in Brazil and elsewhere. The intensive grassland system should not be the fig leaf for crop-based livestock systems, even though the lobbies defending the two are in the same offices (e.g. EBLEX) and have an interest in confusing the two in the mind of policy-makers.

Semi-natural habitats also have a value

But probably the strongest line of argumentation is to come back to the whole point of a climate-change policy. Why are we addressing this issue? There are several reasons: one is to prevent the magnitude of climatic hazards and disasters, but another is to protect our habitats and landscapes (and food production capacity) from climatic long-term changes.

In this second perspective, natural and semi-natural habitats are amongst the most fragile and endangered in the medium to long term and they justify a great deal of climate change based concern. Thus, it would seem rather odd – to say the least – to cause the certain deterioration of valuable habitats in order to address an abstract habitat conservation issue in the future.

This issue is, for example, recognised by the active NGO *Réseau Action Climat* ('Action Climate Network') in France. Though its *raison d'être* is climate change mitigation and adaptation, with mobilisation of high-level expertise, to its credit it constantly reminds us that GHG are not everything, and that an absolute priority is to maintain extensive systems because of their contribution to biodiversity, landscape management and other amenities.

Put simply, you can't save something by destroying it! To do so unthinkingly is bad enough; to set out to destroy it for its own good is even worse!

The point needs to be rammed home: while GHG savings can and should be made in every sector, extensive agriculture provides landscapes and biodiversity which are irreplaceable and that no other sectors can offer. Killing off extensive livestock systems over millions of hectares in order, possibly, to save some 0.x% of net GHG emission is not a high priority. Fortunately, rumours of their death are, so far, greatly exaggerated. Bill: keep the faith with your extensive system!

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Noticeboard

Scottish Government publishes HNV Farming Indicator

Scotland is the first country in the United Kingdom to assess the extent and broad distribution of High Nature Value Farming and Forestry systems. A recently published Scottish Government report (www.scotland.gov.uk/Publications/2011/08/10135254/0) provides a baseline assessment of High Nature Value Farming and Forestry against which progress of the Scottish Rural Development Programme (SRDP) can be monitored. The report suggests that in 2009, 40% of Scotland's utilised Agricultural Area was estimated to be under High Nature Value farming systems.

Two complementary approaches were taken, one using remote sensing data and the other focussing on characterising the livestock grazing systems occurring in Scotland's islands, hills and uplands.

Data drawn from annually collected agricultural statistics was used to estimate the number and extent of farm holdings with HNV farming system characteristics. The proportion of rough grazing on the farm holding was used as a surrogate for the amount of semi-natural habitat which may form the available forage and fodder resource. This was combined with a broad calculation of livestock densities at the holding level to indicate the intensity at which those forage resources were utilised across each farm holding.

Further work is now being carried out to consider the impact that current SRDP measures have on HNV farming systems in Scotland.

History of grassland management in Scotland

Those who think that the past is the key to understanding the present will be interested in a literature review (www.snh.org.uk/pdfs/publications/commissioned_reports/313.pdf) of the history of grassland management in Scotland, carried out by Alasdair Ross of Stirling University for Scottish Natural Heritage.

Court of Auditors report on agri-environment

Having looked at SPS (see *La Cañada* 26), the EU Court of Auditors now turns its attention to agri-environment payments (http://eca.europa.eu/portal/pls/portal/docs/1/8760788.PDF), asking whether they are well-designed and managed. Specifically, it investigates whether:

- agri-environment policy is designed and monitored so as to deliver tangible environmental benefits;
- farmers are well supported through appropriate guidance and correct aid amounts;
- the management of agri-environment policy takes account of specific environmental needs.

While finding good examples to illustrate good practice in most cases, the Court noted a number of common failings, including:

- in many cases, the objectives set are not specific enough for progress against them to be measureable;
- the rationale for the measures chosen (or for not addressing issues identified as serious) often does not emerge clearly from the overall description of the environmental situation in the RDPs;
- the distribution of resources between measures was generally not clearly justified in terms of cost-effectiveness; alternatives to agri-environment often seem not to have been considered;
- achievements difficult to monitor and/or poorly monitored; sometimes different measurements are meaninglessly lumped together;
- the similarity between the obligatory results and output indicators (which can be paraphrased as the difference between 'number of people in the scheme' and 'number of people undertaking successful management of the type promoted by the scheme'!) means that an independent measure is often lacking;
- details of calculations frequently not included in the programmes; the use of averages in calculations can lead to both overcompensation and to making payments unattractive;
- Member States usually don't evaluate what uptake levels are desirable regionally (for example) to achieve the intended benefits;
- management of measures is in general not innovative and insufficiently evidence-based.

9th European Dry Grasslands Group Conference

The 2012 conference will take place on 19-25 May 2012 in Prespa, Greece. Under the overall theme of Dry Grasslands of Europe: Grazing and Ecosystem Services, the following subtopics are proposed:

a) grazing impacts on biotic environment (impacts on plants, vegetation units, fauna, etc.)
b) grazing impacts on abiotic environment (impacts on soil and water resources, desertification, climate change and dry grasslands, etc.)
c) ecology and management of dry grasslands (all types of biotic interactions, succession, biodiversity, restoration and conservation of dry grasslands, etc.)
d) dry grasslands and rural societies (grasslands of high nature value, CAP reforms, permanent pastures, science-based policy, etc.)

All other topics related to dry grassland ecosystems are also welcome. The organisers would welcome participation by those interested in *all* aspects of dry grassland to make this conference as multi-disciplinary as the excellent venue deserves! Registration at http://www.edgg.org/edgg_meeting_2012.html

Europe HNV farming book in press

EFNCP and the Institute for Agroecology and Biodiversity in Mannheim and with support from a range of funders are publishing a book on HNV farming in over 35 European countries.

Alongside general chapters, the main body of the work consists of the country chapters, each written by an experts on that particular state. Each chapter gives an overview of the main types of HNV farming present in the country, illustrated with photos.

The book will be in English, but with a summary of each country chapter in the offical language.

We hope that the book will be a means of learning from one another and foster a sense of community in amongst HNV farmers and their supporters throughout the continent.

The book will be available at the end of 2011 – watch the EFNCP website for further details.

Pastoralism journal

Articles from the latest edition available online under Open Access:

- How can social and environmental services be provided for mobile Tibetan herders?;
- Influence of grazing and precipitation on ecosystem carbon cycling in a mixed-grass prairie;
- Desertification and livestock grazing - the roles of sedentarisation, mobility and rest;
- Effects of cattle rustling and household characteristics on migration decisions and herd size amongst pastoralists in Baringo District, Kenya;
- Mobility and livestock mortality in communally used pastoral areas: the impact of the 2005-2006 drought on livestock mortality in Maasailand.

Access these at: http://www.pastoralismjournal.com/content

Rural Landscapes of Europe – how man has shaped European nature

This handsome book by Swedish conservation biologist Urban Emanuelson, which we intend to review in a forthcoming issue of LC, is available for SEK596 from the following website: http://formas.se/formas_shop/ItemView____5458.aspx?epslanguage=EN

Declines in farming in the Scottish hills and the impact on biodiversity

A report published by Scottish Natural Heritage (SNH) could help inform thinking on the development of HNV farming system support policies, frameworks and strategies (http://www.snh.org.uk/pdfs/publications/commissioned_reports/454.pdf).

Agricultural census data from the Scottish Government has shown that the national sheep flock declined by almost 2.9 million between 1998 and 2009. Similarly, the beef cattle herd declined by 110,783 over the same period. The greatest declines in livestock have been in the hills and uplands of the north and west of Scotland. These declines have been fuelled by a combination of factors, including a general down-turn in the economic viability of hill farms, the foot-and-mouth disease outbreak in 2001, livestock reductions related to agri-environment schemes, and changes in the way that livestock farmers are subsidised.

The aim of this project was to gather information on what is happening on the ground in terms of livestock declines, the changes in management associated with these declines, and the impacts of these changes on the natural heritage and rural communities. The central part of the project was the analysis of information from three case study areas; South Skye, West Borders and North Highlands. A participative workshop approach

was used as the main method of obtaining information about changes and impacts within the case study areas.

The decline in hill farming and crofting was recognised as a significant issue in all three areas, with numerous impacts highlighted. Many of the same issues were raised across the three study areas. Social, economic and community related impacts were generally seen as more important or serious than natural heritage impacts. There were very few positive or beneficial impacts of the decline identified. More negative impacts on the natural heritage were highlighted in South Skye and North Highlands than in the West Borders. It tended to be the inbye ground where most of the changes in the natural heritage and landscape had been observed.

Many of the patterns of change and impacts on the natural heritage and communities that were brought out in the case studies were relevant to the rest of upland Scotland and the crofting areas. Most of the data regarding natural heritage impacts was qualitative and anecdotal. There was very little quantitative data available either from the workshops or elsewhere that was directly linked to recent changes in livestock.

The decline in livestock numbers is unlikely to stop without economic support for hill farmers and crofters through some form of policy change. If the decline continues then the impacts highlighted in the report are likely to become greater and even more widespread, with wider social issues implicated.

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Alternative approaches to payments for non-economic farming systems

Many of the farming systems delivering the highest levels and widest range of public goods are economically very marginal. Support payments for these systems are restricted to compensating the 'additional costs' and 'income foregone' allowed by the WTO agreement on agriculture.

An interesting report (http://www.lupg.org.uk/pdf/ALTERNATIVE PAYMENT APPROACHES FINAL REPORT (pdf version).pdf) commissioned by the UK Land Use Policy Group looks again at these rules, asking which 'income' and 'costs' can legitimately be considered and whether the rather narrow approach taken in many countries could be widened without breaching the WTO rules.

Three approaches are considered:

- The Full Cost of Management approach. Including a proportion of fixed costs, this is relevant for practices in danger of imminent abandonment, and is said to be most suitable in the context of agri-environment and similar payments.
- The Holding-Wide approach, which excludes fixed costs and so could be called a Full Variable Cost of Management approach. It, as the name suggests, is suited to supporting specific types of farming in danger of imminent abandonment or severe decline.
- The Opportunity Cost approach, for use in natural constraint areas. This recognises that the true costs of carrying out farming are not limited to the marginal costs of the activity, not even to *all* the costs of the activity (as per the first two approaches), but are in large part related to the income foregone by choosing not to work in some other economic sector.

The novelty of these approaches varies. Some Member States appear to take the Full Cost approach at present for some of their payments. A Holding-Wide approach introduces no new principles, but merely extends this approach to whole farming systems.

Introducing the Opportunity Cost mechanism would however be something really new in practice and fill a gap which we in EFNCP have pointing out for many years. Farmers delivering large amounts of public goods and environmental services are often getting less income per hour than those on the minimum wage in the rest of the economy and, while the economy grows, their incomes fall further and further behind those of their non-farming neighbours. This report shows that addressing this can indeed, as we have always maintained, be consistent with the WTO.

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Rural'Est update

More documentation on the recent conference '20 years of farming and rural transition in Eastern Europe: what have we learned?' is now available on the Rural'Est website www.ruralest.com.

Forthcoming events include:

April 2012: Rural'Est conference, Danube Delta, Romania. Theme to be announced.

September 2012: Rural'Est conference, Ukraine. Theme: East/East transfer of European rural development experience.

La Cañada reader survey – reminder!

Please remember to tell us what you think of *La Cañada* at http://www.surveymonkey.com/s/B65DKGQ.

Commoners from Abergwesyn, Wales, visiting Spain on a study tour funded by the National Trust and DG Env. Full report in next edition of *La Cañada*.

The European Forum on Nature Conservation and Pastoralism brings together ecologists, nature conservationists, farmers and policy-makers. This non-profit-making network exists to increase understanding of the high nature-conservation and cultural value of certain farming systems and to inform work on their maintenance.

www.efncp.org

Edited and published by the European Forum on Nature Conservation and Pastoralism. This issue was supported by the European Commission DG Environment. The European Commission is not responsible for any use that may be made of the information contained herein.

The editor would like to thank the following: Mike Alexander, Guy Beaufoy, Siôn Brackenbury, Fernando Garcia-Dory, Bill Grayson, Peter Lanfear, Davy McCracken, Patrick McGurn, Sarah Mellor, Juergen Metzner, Richie Morris, Tomasz Pezold, Xavier Poux, Koen de Rijck, John Rodwell.

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