La Cañada

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Great white egrets and purple heron on a wetland restored by the Network in Hungary. See article page 6.

László Haraszthy

An open letter from the Baltic Farmland Biodiversity Conference

Dear Agriculture Commissioner Çiolos, Chairs of the Agriculture Council and COMAGRI Messrs. Aletraris and De Castro,

The Baltic Sea Region is characterised by strong seasonal climatic conditions that gave birth to a number of region-specific adaptations to growing food. These conditions and farming practices have created a landscape and nature that are globally unique. Since biodiversity is a comprehensive concept that is not limited to the eligible area for CAP subsidies, it is important to look at the whole landscape area when considering important land-use policies such as the Common Agricultural Policy.

Moreover, because of its climate-limited low productivity, farming in the region and the biodiversity associated with it are highly dependent on the environmentally positive support channelled through the Rural Development Programme. This becomes especially important at a time of high abandonment of farmland resulting from a decrease in the economic and social sustainability of the often High Nature Value farming systems.

The best way to support these forms of agriculture is to recognise the public goods they deliver for society and apply therefore the principle of 'public money for public goods'. In this way, the forms of agriculture that are supported by public money do not only deliver for the individual farmer but for the whole of society.

As the work on the reform of the CAP proceeds, we ask you to consider the following remarks, which were also communicated to Mr Van Rompuy and the Heads of State from the Baltic Sea Region.

1. Proposals have come to our attention that **Pillar 2** of the CAP is under serious threat. Given the challenges that this policy will have to solve, we urge that no mechanisms are put in place to cut more money from Pillar 2 but instead to allow only for mechanisms to increase this very important funding stream. In the light of the increased abandonment of agricultural land, including High Nature Value farmland, it is important that these funds remain available to ensure that farmers

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PMK

Organising team of the conference 'Quo Vadis Farmland Biodiversity?'

are not leaving the land and hence that the management and traditional use of these areas is continued.

2. The **definition of pasture** (including meadows), as formulated by the European Commission in its legal proposal, needs further refining, as it does not reflect the reality of land-use in the region. Currently, not all of these pastures and meadows are eligible for direct support. The text should be phrased such that traditional agricultural land, kept in a state suitable for agricultural production, should be eligible for support under Pillar 1 as well as Pillar 2. A potential definition could be based on the proposal of EFNCP: *Pasture (including meadows) is land that is used to grow grasses or other forage (self-seeded or sown), and that has not been ploughed or reseeded for five years or longer*.

All the management-dependent habitats of the Habitats Directive should be eligible under this definition.

The current guidelines on the maximum density of trees do not correspond to agricultural reality in the Baltic Sea Region. The difference between a forest and pasture or meadow land depends only on whether it is grazed or mown or managed with other traditional agricultural practices. There should not be a limit on the number of trees.

Ensuring that the land is agricultural may be accomplished through a minimum and maximum stocking density per habitat type or intensity of mowing per habitat type/region.

3. We would like to stress that landscape heterogeneity and **habitat mosaics** are important for preserving biodiversity. There should be a better system to value these characteristics.

We do not see the necessity to remove small features (even larger than 100m^2) from the eligible area as they are natural or semi-natural parts in the Baltic Sea Region and as such contribute significantly to the biodiversity of the habitat.

We believe that Ecological Focus Areas (EFAs) are key contributors to the preservation and re-creation of these features' heterogeneity and of the landscape mosaic. Therefore it is important that they are present at farm and farmed landscape levels. This means that landscape elements should be counted as eligible elements and be paid for within the CAP.

The list of elements that should be included in these EFAs should reflect Europe's diversity and should include or allow all those biodiversity valuable elements that are particular to the Baltic Sea Region. Specifically, patches of semi-natural vegetation must also be able to count towards EFAs. In the current proposal they do not, while afforested land is counted. This could lead to afforestation on semi-natural areas, with very damaging effects on biodiversity.

4. The **general sustainability** of the agricultural systems remains of key importance. You should not think only of the currently highly biodiverse High Nature Value farms or protected areas, but aim to look at the sustainability of the whole landscape. This includes forests (both inside and outside Natura 2000 areas) and the wider environment, such as the marine ecosystem of the Baltic Sea, which is in a dire state partially because of polluting agricultural practices.

We trust that you will take these remarks into account during your negotiations on the regulations and the drafting process of the implementing regulations and guidelines.

Yours sincerely,
The Conference Participants, Tartu, 19th November 2012.

Campaign on semi-natural pastures in CAP continues

EFNCP continues to work to ensure that CAP rules and measures and their implementation are fit for purpose when it comes to semi-natural permanent pastures.

Brussels policy seminar 13th November

Organised in collaboration with our German colleagues in the German Landcare Association (DVL), we held a seminar in Brussels whose theme was semi-natural grasslands as a golden thread through both agricultural and environmental policy.

Uncultivated grasslands, including self-seeded herbaceous and scrub vegetation that is used for livestock grazing and/or mowing (i.e. pastures and meadows) cover approximately a quarter of all EU farmland and are the most important farmland for a range of EU policies, including biodiversity, climate change, soil, ecosystem services and green infrastructure. A greener CAP that is focused on public goods should recognise the importance of these semi-natural grasslands, and give them special attention.

However, at present, the CAP does not even recognise the *existence* of semi-natural grasslands, lumping them alongside cultivated grasslands (ploughed and sown) in the single category of 'permanent pastures'. Despite their special characteristics and environmental importance, there is no specific category for semi-natural grasslands, no specific cross-compliance requirements, and no mention of them in the proposed greening mechanisms.

In fact, with the move to hectare payments and the introduction of new payment eligibility rules linked to vegetation types, the CAP has become increasingly biased *against* semi-natural grasslands by penalising characteristics

that are typical of them, such as a high proportion of shrubs, trees and other landscape features. Thus, for semi-natural grasslands, there is a clear absence of joined-up EU policy, with the CAP apparently being in conflict with a range of environmental goals, rather than supporting them. Although the CAP aims to support 'multi-functional' agriculture, integration with other policy goals is notably absent for the farmland type which best encapsulates this principle.

The Brussels seminar considered how to correct these deficiencies in the CAP, in relation to:

- Definitions of permanent pasture, including the question of non-herbaceous pastures and the possibility of creating a sub-category for semi-natural permanent pastures.
- Eligibility rules for CAP direct payments in relation to semi-natural grasslands, including characteristic features of pastoral farmland, such as shrubs, trees, rocks and hedges and seasonal pastures.
- Defining 'minimum activity' in relation to semi-natural grasslands, as a better approach to determining eligibility than vegetation types.
- The pros and cons of identifying and registering semi-natural grasslands on the Land Parcel Identification System (LPIS), and its potential usefulness for efficient implementation of the EIA Directive, Renewable Energy Directive and Biodiversity Strategy targets relating to habitats, ecosystem services and green infrastructure.
- The possibility of specific cross-compliance and greening rules for semi-natural grasslands, as an integrated policy approach (i.e. CAP rules that support environmental Directives).

The seminar presentations showed that data and administration systems are crucial to the success of the new goals which policy has set itself in the CAP and the Biodiversity Strategy.

Policy must be *clear* about which farmland types are priorities for delivery of public goods and services. Successfully targeted policy then implies that those types of farmland and their use can be clearly identified. However, current policy proposals are far from clear – the Greening put forward by the Commission does nothing to protect semi-natural permanent pastures. The Biodiversity Strategy, in turn, is silent on the importance of this type of farmland in achieving its targets.

The way forward could be clear and far from difficult, given the political will, as Guy Beaufoy outlined in LC28. Yet there seem to be many barriers to the necessary policy improvements. DG AGRI officials seem sympathetic to our proposals, but are very wary of anything that cannot be very precisely controlled by the auditors (even though there is nothing very 'precise' about spending €40 billion per year on blanket, untargeted subsidies that are linked to no clear policy objective).

Csaba Sogor

Four of the panelists at the European Parliament: Gergely Rodics (Pogany-havas); Csaba Sogor MEP; Rebecca Barrett (North Pennines AONB); Guy Beaufoy (EFNCP).

They are also understandably wary of asking the Member States to do anything requiring more work, such as introducing a new semi-natural pastures category to LPIS (the priority for many national governments is to spend EU funds with the minimum amount of administrative effort, rather than investing in tools for ensuring better outcomes on the ground).

Meanwhile, the European Parliament's COMAGRI committee seems to have little appetite for improving the public benefits of policy, and more for defending the interests of mainstream farmers. The 'stop press' report to the seminar by Andrzej Nowakowski suggested that COMAGRI as a whole is not supportive of the changes we are proposing for permanent pasture rules, except for some wording to include pastures with non-herbaceous species in the CAP definition.

European Parliament event 8th November

The enhanced role of the European Parliament, using its new co-decision powers on agriculture for the first time, in this CAP reform has posed huge challenges to that institution, with hundreds of amendments tabled. In early 2013, they will embark, with the Commission and the Council, on the uncharted waters of the trialogue in order to seek agreement on definitive CAP texts.

Against this background, our friends in the NGO Pogány-havas (from Transylvania), with the kind assistance of their local MEP, Csaba Sógor, organised another seminar in the Parliament buildings in Brussels, following up on the successful event in 2011.

The focus this time was on traditionally managed hay meadows. Full of flowers, insects and other animal life, they are among the most biodiverse places in Europe and a source of joy, inspiration and beauty to all. They are a living part of our shared culture and heritage. They provide many environmental, social and economic benefits. Although supposedly protected by EU policy and subsidies, they continue to disappear, through abandonment, intensification or conversion to other uses.

The seminar discussed how European institutions can protect these treasures and support the farmers who manage them more effectively.

Not all countries are delivering just now. While Romania has a commendable and ambitious agri-environment scheme for HNV grasslands, albeit one which needs both extending and to be better adapted for hay meadows, Spain, for example, has vast areas of HNV farming and hay meadows, but has very limited agri-environment schemes for them. Hay meadows are in severe decline as a result.

The EU institutions and governance systems do not ensure that there is a consistent effort to deliver EU priorities, or best practice – a situation which makes a mockery of EU goals and institutions.

Agri-environment schemes are essential, but not enough. There needs to be measures to support the farming systems and economy, and in this context local NGO projects working with farmers make a crucial difference. They multiply the benefits of top-down schemes, and should be financially supported through the CAP.

Post-2013, the seminar concluded, the

EU must:
- Continue to transfer funds from Pillar 1 to agri-environment.
- Have agri-environment schemes which are better adapted to the needs and challenges of maintaining hay meadows.
- Make funds available through RPDs for local co-operation projects involving NGOs and farmers.
- Put in place rigorous 'before the event' evaluations for RDP Priority 4 (Natura 2000 and HNV farming), and measures that are a response proportionate to the identified needs on the ground.
- EU institutions must insist on this rigorous approach from all Member States.
- Monitor the extent and condition of hay meadows and of related farming systems and practices.

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Agri-environment failing Scottish common grazings

Ardfenaig common grazings, Mull. The Scottish RDP offers little support for well-managed grazings.

Sarah Charlesworth, Creative Commons Licence

A major new EFNCP report, part-funded by the European Commission and the Foundation for Common Land, raises serious questions about the suitability of current agri-environment (AE) provision for Scotland's half a million hectares of common grazings.

Common grazings are a very significant element of the land use system in Scotland's more fragile rural areas, and provide a wide range of public goods in association with socio-economically weak agricultural systems.

However, they have not been specifically considered during the drafting of the current RDP, and the uptake of the various measures by common grazings committees has not been assessed by the Scottish authorities.

Low uptake

According to Government data, the uptake of both the non-discretionary and discretionary AE measures are abysmal (4.8% and 5.6% respectively), even in the context of low overall uptake (20.3% and 16.2%). In general, uptake by grazings is substantially lower than overall uptake, even in the same parish.

A range of factors are thought to be at play, including:
- Large numbers of grazings are 'unregulated', i.e. there is no officially recognised committee that can be an applicant;
- General difficulty of application compounded by additional difficulties for grazings, including getting agreement of large numbers of stakeholders and the requirement to balance the needs of inactive and active graziers;
- High bureaucratic thresholds, including the necessary degree of agreement and requirement to provide accounts;
- Weaknesses in advisory provision and lack of capacity in the responsible State body to extend the regulation and support committees;
- Cost of advice/application, especially given transaction costs of grazings; and
- Paucity of attractive options, especially of support for positive management, with specific problems with the option to support cattle grazing of rough grazings.

Recommendations

The report makes a number of recommendations. While these relate to common grazings only, they should be further integrated with the needs of small producers in the same regions, as well as with those of the wider agricultural and rural community in marginal areas.

Programming
- Common grazings must feature specifically, and in a quantified way, in all sections of the new RDP, from the prior evaluation to measure design and the monitoring plan.

Advice

There should be:
- At least a doubling of advisory provision in marginal areas, building on existing State Aids within the RDP framework. Outcomes should relate specifically not just to small farms but to common grazings and should be accompanied by a review of end-user cost.
- Free provision of advice to common grazings on all matters where the scheme does not allow for specific support.
- Appointment of dedicated advisors, working in collaboration with Government agencies in the overall context of capacity building and community development work on common grazings.

Agri-environment

There should be:
- An improved moorland management measure and replacement of current summer cattle-grazing option.
- Relaxation of the shareholder consent rules for entry into AE and abolition of the need to provide accounts in support of AE applications.

Collaboration
- Support workers for the extension and updating of grazings regulation should be provided for the overwhelming majority of grazings, with parallel support for the transaction costs of grazings committees, distinguishing in particular the higher costs of hitherto unregulated grazings. Synergy with an expanded advisory service would be very desirable. If this measure is deemed inappropriate for funding additional agency staff, the use of technical assistance funding should be considered, as has happened in Wales.

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Reoprt available at http://www.efncp.org/download/SRDP-CG-report.pdf

The Chillingham wild cattle of Northumberland: an evolutionary puzzle and a challenge for pastoralism

The Chillingham wild herd is a small, vulnerable, but viable, population of genetically uniform cattle associated with a relict medieval pasture woodland system (Hall 2006) in Chillingham Park, Northumberland, UK. Uniquely, this historic herd is being conserved in parallel with its ancient habitat by the Chillingham Wild Cattle Association, a member of EFNCP.

The pasture woodland vegetation that supports the herd has recently been characterised (Hall & Bunce 2011; Bunce & Hall, in press) and is being managed appropriately with support from the UK's Higher Level Stewardship Scheme, the Tubney Trust and other benefactors.

It is not known when the Chillingham herd was isolated from the wider landscape, the earliest record being 1646. The evolutionary status of the cattle has been of interest for a long time, notably attracting the interest of Charles Darwin (Darwin 1861). Progressively, through inbreeding, it has become remarkably genetically uniform, as confirmed by recent work on microsatellite DNA (Visscher *et al*. 2001).

The genetic uniformity of the cattle and their continuing vitality implies that lethal recessive genes have, over time, been purged from the genome. This is recognised as a possible, though improbable, result of prolonged inbreeding – extinction being a more likely outcome in most situations. This unusual evolutionary outcome in a free-living herd continues to be of considerable scientific interest (Visscher *et al*. 2001), as well as a growing concern for conservation.

The small size of the Chillingham herd and its lack of genetic diversity put it at risk from exotic diseases (FAnGR 2012) and random events. In response to these threats, a reserve herd, which now numbers 35 animals, and is not open to the public, was set up by the Chillingham Wild Cattle Association, in the north of Scotland in 1970. This timely and highly successful translocation initiative is being supported by the development of a cryoconservation programme involving the storage of sperm and cell cultures.

Although the wider security of the herd will be an ongoing concern, the main priority of the Chillingham Wild Cattle Association remains the maintenance of the cattle at Chillingham itself (described by Hall *et al*. 2005). Although the herd totals 100 animals, half of these are males (there is no castration and culling for welfare reasons only) and there are probably only about 20 proven breeding females in the herd.

A major advance in the management of the herd was the removal of the sheep flock in 2005, reducing grazing pressure on the 134ha of the park, although the herd remains dependent on winter hay. Apart from this, management is minimal, and Chillingham provides a very rare opportunity for study of the behaviour of cattle effectively free of human interference.

An academic bibliography about Chillingham and the cattle is available at http://webpages.lincoln.ac.uk/sthall/chillinghambibliog.doc

Colin Hindmarch, Stephen J G Hall

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Chillingham wild cattle.

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Preservation of open pasture lands in Hungary – the work of the Nature Conservation Public Fund Network

László Haraszthy

The Network has 40% of the national herd of Hugarian grey cattle and provides half the country's breeding bulls.

Historically, Hungary, dominated as it is by the flat plains of the Tisza and Danube, has been a pastoral country. In the 18th century, 100,000 grey cattle were sold annually to western and southern Europe from an area of only 93,000km^2.

In 1990, at the time of the change of the political system, the number of cattle in Hungary was 1.4 million, although a significant proportion of these were kept not on pastures but in cowsheds. By 2012, this had dropped to around 700,000.

Regrettably, the decrease in the number of sheep has been even greater, while the extensive pasturing of pigs has practically come to an end.

Increasingly serious signs of the lack of grazing can be seen not only on mountain, hill and floodplain grasslands, but also on the Great Plain and in Transdanubia. Considering that Hungary's most significant natural assets, such as the great bustard (*Otis tarda*), imperial eagle (*Aquila heliacal*), red-footed falcon (*Falco vespertinus*) and saker falcon (*F. cherrug*) are associated with open, grazed pastures, the lack of agricultural use brings about not only economic detriment, but also problems for a number of species and habitats for which Hungary has international obligations.

The change in the political system has, however, opened up the opportunity for civil organisations to purchase areas rich in natural assets and to develop livestock systems that are well suited to the ecological characteristics of the land.

A number of such locally-focused public foundations have come together in a national network. The Nature Conservation Public Fund Network aims to purchase and maintain wildlife-rich areas, to rehabilitate them as necessary, to carry out environmental education and to advise farmers. Alongside the preservation of endangered species, it is also engaged in eco-tourism to boost the economic resilience of the areas it manages.

Land management and wildlife

Currently, the Network manages 10,000ha, half of which it owns. Most of the land is wetland, but it also has floodplain pastures, as well as dry hilly areas and mountain pastures. Most of the work is carried out by the Network; smaller parts are leased out to the local farmers.

The Network has a significant number of livestock. Wetlands and seasonally flooded areas are grazed primarily by Hungarian grey cattle and buffaloes. The organisation has 4,000 out of a total national herd of 10,000 grey cattle, 500 buffalo and 650 mangalica pigs. In order to preserve the genetic characteristics of the Hungarian grey cattle it is also engaged in rearing certified bulls, and supplies half of the breeding bulls in the country.

The surplus animals are sold or used to make salami – high-quality grey cattle beef is in great demand in Hungary, but there is also serious interest in buffalo meat.

The Network was able to purchase land which farmers did not want to use because of agronomic handicaps. It has also started working on the rehabilitation of once similar areas which were drained in the period after the Second World War. So far, this work has been completed in three areas, while another three are under active restoration, at the cost of €3 million, mainly from EU funds.

A significant part of the Network's land is designated as High Nature Value Areas under the Hungarian RDP, and a large proportion is also in the Natura 2000 network.

The employment of 100 staff by the Network is very significant in the rural areas where it operates.

This management supports a very rich biodiversity. On the grasslands there is a significant population of breeding great bustards. Although present in small numbers, Montagu's harrier (*Circus pygargus*) is also a regular breeding bird.

The red-footed falcon is a regular visitor to the short grass areas of the *puszta* and breeds in small numbers, as does the saker. Imperial eagles use the aftermaths for hunting, while on the wetlands, the white-tailed eagle (*Haliaeetus albicilla*) is often seen all year round.

On the wet meadows and wetlands there are breeding populations of greylag goose (*Anser anser*), common snipe (*Gallinago gallinago*), black-tailed godwit (*Limosa limosa*) and common redshank (*Tringa totanus*), as well as smaller numbers of corncrake (*Crex crex*) and Baillon's crake (*Porzana pusilla*).

Tens of thousands of geese rest on the meadows on migration and flocks of waders, several thousand strong, feed on the same areas.

Agrotourism and education

The Nature Conservation Public Fund Network has three visitor centres, as well as nature trails and other interpretation facilities, and offers guided tours. In total, there are around 12,000 visits a year.

On the farm advice front, the Network organises technical demonstrations, for example, on how to mow in an environmentally friendly way – a subject on which it has also published a book and other printed material. One of the members

of the Nature Conservation Public Fund Network functions as an extension department of the University of Agriculture.

The Network is regularly involved in training those who implement agri-environmental programmes. It also has a co-operation agreement with four universities and two colleges, organising field work for them, hosting students writing their dissertations, and collaborating with their research projects.

Alongside this are two forest schools catering for 2,000 children a year – the activities for the next year are usually booked out by October! Another 300-400 children attend summer camps.

The Network has taken over from Birdlife the organisation of the national Day of Birds and Trees, which is held every year for Hungary's school children.

Shepherds have always represented a separate caste of society. Some of the customs and traditions which they preserved for generations are now, regrettably, forgotten. The Nature Conservation Public Fund Network recognises that keeping the remaining knowledge alive is a task of great importance. As a public symbol of this, it is promoting the marking of one of the most important annual events for shepherds – the driving of the sheep from their summer fields to the winter quarters. These festivals are attended by several thousands of visitors, harking back to the times when they were massive community events. They offer an opportunity for the local craftsmen and farmers to market their products directly to the public.

Donald Macaulay, Creative Commons Licence

Montagu's harrier can be found breeding on Network land.

The Nature Conservation Public Fund Network has thus far been primarily active in Hungary, but in future it would like to share its experience at the transnational level. It is ready to give help through bilateral or multilateral co-operation on all its activities, from genetic conservation and management techniques to environmental education. The time has come when we who received tremendous help during the development of our own network must in turn share our hard-earned knowledge with those who are now taking their first steps.

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Sustainable management of municipal commons in Bulgaria

The introduction of CAP support schemes in Bulgaria in 2007 necessitated a significant change in the way common pastures were governed by municipal authorities and, as a result, used by farmers (see *La Canada 26*).

As time went on, it became apparent that municipalities were implementing the new rules in a range of very different ways. More worryingly, it emerged that the new rules were not actually helping most of the farmers. Meanwhile, there was no sign of any diminution in the confusion at municipal administration level.

The significance of the issue inspired EFNCP and two partners – the Civil Association for Sustainable Use of Pastures, Meri and Meadows and the Bulgarian National Association of Municipalities – to team up to apply for GEF Small Grants funding to investigate further.

The project is entitled 'Enabling conditions for sustainable management of grassland habitats' – a reflection of the biodiversity importance of High Nature Value grasslands on municipal pastures and meadows, which account for around 60% of all grasslands in Natura 2000 areas in Bulgaria.

Regulatory framework

The first findings of the team were really not too surprising: in practice, the combined implementation of the relevant existing laws on use of state and municipal pastures, and the CAP support eligibility definitions for pastures and regulations for the use of municipal property are riddled with contradictions.

The process by which municipal pastures are being leased is confusing, and many municipalities do not implement this at all. Bulgarian land-use law gives the right to municipal councils to designate part of the communal land as being for public (i.e., common) use by the small farmers of that settlement. The remaining area can then be leased out 'privately' to farmers for their individual use, with priority given first to livestock farmers registered in the settlement or the adjacent settlements and then to farmers for fodder production. However, the municipal property law states that *all* leasing or renting out of municipal property must be by way of a tendering procedure.

The three pilot municipalities of the project, Dragoman, Ivailovgrad and Kardzhali, all had a different approach at the time of investigation.

Dragoman had no regulations or rules governing either the common or individual use of pastures. Where grazing was still happening, it was informal, based on the historical practice of free use of common pastures. But this *laissez-faire* approach meant that the grazed commons were not eligible for CAP support, since the user could show no documentary proof to support his claim.

Ivailovgrad municipality had made the initial steps to develop its legal base for distribution of its pastures and meadows, but there was significant scope for improvement, especially in providing for small farmers.

The municipality of Kardzhali, on the other hand, had taken significant measures and was delivering by far the best results. All its pastures were being allocated without a tender procedure to all farmers who had used them historically. They had reconciled all the relevant laws to their

Vyara Stefanova

Common grazing in the Pirin area. Very few of these grazings receive CAP support, despite their importance.

own satisfaction in a way that provided a legal underpinning for the traditional use of common pastures, providing a potential model of good practice.

However, the scope for interpretation seems to be too wide: in most other municipalities, Kardzhali's good practice is considered to be in conflict with the municipal property legislation and thus unlawful. What they do instead is to launch the tender for individual use *first* and leave the remaining grassland (usually the poorest) for common use by small farmers – a procedure which also has the happy result of increasing the income for their coffers. But while this conforms to the requirements of the law on municipal property, it contravenes the Order of the Minister of Agriculture on the governance of pastures, and leaves small farmers without a legal base for claiming the common pastures on their application for CAP subsidies.

The eligibility rules for participants in the tender are defined in a ministerial decree, but the order of priority does not favour (we would go so far as to say, discriminates against) small farmers, in that tender participants must have at least ten beef cattle and/or buffaloes *or* at least five milk cows/heifers *or* at least five horses and/or donkeys and/or mules *or* at least 50 ewes and/or goats.

Given that the main threat to grasslands and related ecosystems in Bulgaria is abandonment, it is really difficult to understand, from any policy perspective going beyond short-term convenience, why small farmers are excluded from individual contracting.

These are all good reasons why the project is developing and piloting a standard methodology for the governance of municipal pastures. We aim to test it in the three pilot municipalities before we promote its implementation at the national level.

This will be structured around the following key issues:
a) analysis of grassland resources in the municipality;
b) governance and management of municipal grasslands;
c) annual monitoring of grassland ecosystems. This work will continue into 2013.

Data reliability

Another issue of great concern is the availability and reliability of data on common pastures and meadows. The actual area and status of municipal grasslands are not known or monitored in most municipalities. In addition, the data held by the municipal administrations differ significantly from the cadastral maps available at national level.

Not only that, but municipal authorities rarely have access to the Land Parcel Identification System (LPIS) data on which CAP payments are based, and especially to its 'Agricultural land in GAEC' layer. This was the main reason for starting our analysis at the national level.

According to this national data, 766,045ha of pastures and meadows were managed by the municipalities in 2011 (see Table 1), a decrease of 2.18% compared with 2008. This is on top of a 6.77% reduction in the area of *state* pastures and meadows in 2011.

There is currently a process of re-classifying the so-called 'permanent' land use of agricultural land. Experts estimate that around 200,000ha of (abandoned?) agricultural land currently classified as grasslands will be transferred to the forest estate. This is approximately a quarter of all current municipal and state grasslands.

The Ministry's Agriculture Report 2012 contains, for the first time, a figure for pastures, and meadows in common use (as declared by farmers in the 2010 Agriculture Census). This figure of 876,000ha is remarkable, in that it is almost equal to the available state and municipal pastures, and yet we have a serious problem of pastures abandonment!

The most likely explanation is that the common grazing land farmers are actually using might not be the same land as the public pastures recorded in the land cadastre, but is instead long-uncultivated arable land which is situated much closer to the villages than the traditional common pastures.

Further analysis of the situation in the three municipalities and the results of the pilot methodology exercise will be presented in future issues of *La Cañada*.

Our interim conclusion is that there is an urgent and increasing need for flexibility in the implementation of regulations at a local level. The current national legislation is not able to respond to the specific situations which arise in the different municipalities and with their farmers. The introduction of a regional or local approach to grassland management is needed for the situation to have any chance of sustainability in the long term.

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Table 1. Pastures and meadows managed by municipal authorities (cadastral data)

Ownership	2008 (ha)	2011 (ha)	Change (%)
Municipal	297,063	544,616	+83%
Managed by municipalities*	486,079	221,429	-54%
Sub-total	783,142	766,045	-2.18%
State	126,906	118,311	-6.77%
TOTAL	910,048	884,356	-2.8%

*Pastures and meadows which were not claimed by their former owners during land restitution and which became municipal land ten years after the end of the restitution process.

Integrating biodiversity in the CAP – what strategy?

The year 2012 marked the start of a collaborative project between EFNCP and IDDRI (the Institute for Sustainable Development and International Relations) on biodiversity integration in the CAP.

The background of the project is the general failure of the CAP and other EU policies to conserve biodiversity, despite the formal strategies that have been proposed for more than a decade. The CAP is a key sectorial policy which needs to be to be addressed as one of the paramount drivers of change in biodiversity throughout the EU.

The partners consider that there is a need not only to make the CAP 'greener' – for instance, to introduce some new mechanisms for the environment, e.g. through increased resource efficiency, but to address genuine biodiversity objectives through more profound policy changes.

In particular, this needs to include the conservation of farmed semi-natural habitats by consistently targeting payments towards low-input (HNV) farming systems, and incentives for the environmental adaptation of more intensive systems to benefit biodiversity.

In this light, the current CAP reform seems already to be a missed opportunity, so there is a need to look further, anticipating strategic room for manoeuvre in the coming years.

To discuss this issue, IDDRI and EFNCP organised a workshop of invited participants who are genuinely concerned with biodiversity issues regarding the CAP.

The objectives of the workshop were to identify common ground for those involved, to strengthen their arguments and to identify the possible ways forward.

As part of the preparation, two pieces of work were undertaken. One, on the macro-economic effects of the CAP, follows on from the article by Xavier Poux in *La Cañada* 28, while the other, on the effect of international negotiations on the CAP, is summarised by Sarah Lumbroso and Viviane Gravey in the following article. Both papers and further details are available at http://www.efncp.org/events/seminars-others/cap-brussels2012/

International negotiations and debates: to what extent do they hinder or foster biodiversity integration in the CAP?

In the current round of reforms of the Common Agricultural Policy, of all the environmental issues being faced, biodiversity requires specific attention. This is because the development of agriculture in Europe has been intimately linked with the development of specific types of habitats, involving semi-natural vegetation, which, as has been pointed out by Poux (*La Cañada* 28), is the backbone of European biodiversity. A policy integrating concerns for biodiversity therefore needs not only to avoid environmental harm to semi-natural vegetation, but also to support the specific farming systems necessary to *maintain* them (a 'do good' policy).

What is more, integrating biodiversity into the CAP is not just a European problem. The CAP, through its supports for European agricultural exports, affects global agricultural markets, and so has a far-reaching dimension. The important international impacts mean the CAP is often discussed in, and influenced by, international negotiations and debates.

These influences can be contradictory – some may favour biodiversity, while others hinder it. For instance, the 2010 Nagoya Convention on Biological Diversity conference called for pro-biodiversity incentives, as well as – and this is new – the withdrawal of subsidies that are harmful to biodiversity. On the other hand, the push for biofuels, justified on the back of climate-change concerns, is a potential threat to biodiversity preservation.

This short article highlights the major findings of a larger study, available on the EFNCP website, the aim of which is to develop a better understanding of how the key issues for biodiversity in the current CAP reform are linked to international negotiations, and how international negotiations in turn play out in the present CAP 2020 policy debate.

WTO negotiations: how much pressure for decoupling?

Since the Uruguay Round of trade negotiations started in 1986, there has been continuous pressure from the GATT/WTO to liberalise agricultural markets and policies.

As far as domestic support is concerned, the European Commission's interpretation of liberalisation since 1992 has been further decoupling, in order to allow CAP instruments into the WTO green box[1]. Decoupling is viewed as legitimising the CAP (and therefore its budget) and safeguarding it from attack by trading partners.

Agricultural subsidies in the WTO green box are those which do not distort trade, or at most cause minimal distortion, and are not subject to reduction commitments.

Yet, while such decoupling as has already happened has reduced international pressures on the CAP, it is only part of the story. Indeed, it would be wrong to portray the EC as merely obeying the admittedly formidable external pressures. The EC has also used WTO pressures, interpreted and framed in a certain way, to obtain from conservative Member States a CAP reform it deemed necessary for competitiveness.

Internally, it is also significant that decoupling makes it easier to keep expenditure under control; it is technically and politically easier to allocate fixed budgets rather than counter cyclical payments.

Furthermore, the Commission retains important room for manoeuvre, as it is the EC itself that decides into which 'box' its CAP instruments fit. The fact that WTO negotiations have stalled since 2005 reinforces the perception that, to a large extent, the WTO's 'external' pressure has in fact been internalised and mobilised by the EC itself.

As for biodiversity conservation, the WTO rules give contradictory signals. On the one hand, decoupled payments are preferable to coupled payments, as they do not encourage further intensification (the 'do no harm' perspective). On the other hand, decoupling implies breaking the link between payments and *all* production patterns, even those extensive ones that are necessary for biodiversity conservation, and so can lead to land abandonment or intensification of such extensive systems. Such changes would have a negative impact on biodiversity; decoupling is likely to fail the 'do good' test.

[1] www.wto.org/english/tratop_e/agric_e/agboxes_e.htm

1992-2003: convergence between liberalisation and biodiversity integration?

The intention of the MacSharry reforms was to limit overproduction and contain the budget. Decreases in price support and the decoupling of subsidies were expected to lead to de-intensification on the one hand and the enhanced competitiveness of EU cereals on the other.

The 1992 reform also marked the entry of environmental issues into the CAP, in an international context which stressed the integration of environment into policies – 1992 was the year of the Rio World Summit. Agri-environmental measures (AEM) were put forward as efficient, WTO-compliant tools for the integration of environment into the CAP.

The 1992, 1999 and 2003 reforms offered a compromise between the demand from EU citizens for more consideration of the environment (nature conservation and water pollution, in particular), WTO requirements and internal budgetary pressures. Despite this background, the scale of real change was limited by the political imperative to avoid budgetary shifts between Member States and categories of farmers.

For the environmental participants, the main objective of this period was therefore to improve the policy using the existing tools – the 'do good' approach of agri-environment measures in what became the Pillar 2 and the 'do no harm' tools of cross-compliance.

Since there were no obvious contradictions between liberalisation and the environment, 'multifunctionality' was trumpeted as heralding a win-win approach. At the same time, progress, while real during this period, was also limited by budgetary constraints - insufficient funds were shifted to the Pillar 2 for the 'do good' spending to match the scale of the need.

2008-present: the return of the production mantra

After a decade when the narrative of increased production had been replaced with one of internal competitiveness, in which options for the de-intensification of European agriculture could be debated, the 2008 reform heralded a new era.

It was adopted in a rapidly changing international context, with price hikes and volatility, hunger riots and a growing concern with 'food security', all of which allowed the resurrection of the arguments for encouraging production. While competitiveness remains a major objective for European agriculture, the context is now one of high agricultural prices, and so the option to restrain production to reduce the pressure on natural resources is once more being questioned.

In the meantime, environmental issues have gained in importance internationally, but with a major new focus on climate change. The development of the biofuels policy (justified on climate-change mitigation grounds) shows how productivist forces can manipulate arguments advanced in international negotiations to justify their agenda.

The environment seemed to become ever more important as a legitimising argument for the CAP, as illustrated by the introduction in the Health Check reform of the 'new challenges' of climate change, bioenergy, water management and biodiversity, but note that although biodiversity is formally mentioned in the CAP, it is now part of a more diverse set of objectives and is not very high on the agenda.

In fact, the emphasis on the environment is mostly formal; the conclusions of the Health Check reform reveal the gap between the place of environment in CAP discourse and its actual place in the policy instruments, with the advent of biofuels incentives and the suppression of set-aside.

This impression has only been heightened by the current reform debates, which initially promised a very significant reform of the CAP, with a real shift in policy towards the environment, as illustrated by debate, encouraged by the Commission, on 'public money for public goods'. These high hopes were dashed by the actual Commission proposals, which do not imply any significant change in agriculture and the policy's impacts on biodiversity.

Conclusions – EU power structures are the key

The impact of international negotiations and debates continues to grow ever more complex. While WTO was the main international driver for reform in 1992, in 2012 climate, biodiversity, and food security are all marshalled in support of the CAP.

A coalition of interests is gathering round the bioenergy for climate and food-security issues in order to justify increased production as the only option in the international context. These arguments threaten biodiversity integration, which is stereotyped as a secondary, luxury option.

On the other hand, the Millennium Ecosystem Assessment led to the Nagoya conference of 2010 setting clear objectives that could (depending on political will) have a positive impact on the CAP, especially on the issue of 'biodiversity-harmful' subsidies. However, this international commitment does not, so far, seem be having any influence on the design of the CAP.

The overall impression is that while a range of organisations from all sides phrase their arguments in 'international' terms, doing so seems to add little to their impact unless the overall balance of power is favourable to them. In other words, whatever the force of their arguments, the defenders of the agricultural sector and of the budget allocated to it remain dominant, and environmental viewpoints are secondary.

Proponents of increased agriculture production have no difficulty with credibility; they can even advance widely discredited arguments without ill effect. For instance, the need to 'feed the world' continues to be used as a reason for increasing food production in Europe, although it is known that this is quite likely to have some negative impacts on food security in the least developed countries.

Environmentalists, in contrast, have to be extremely convincing, and they have to refer to very powerful, perfectly documented arguments. But when they develop credible arguments, they can actually win, as the biofuels issue illustrates.

Increased production is presented as a given and beyond argument by those who have an interest in it. The concept of 'sustainable intensification' is not mobilised to influence *change* in the CAP but rather to support the status quo for productive agriculture.

This turns the environment from being a major driver for reform in 2013 (public goods etc.) to being a factor *against* change. The same logic allows the presentation of explicitly environmental measures, such as greening, as constraints leading to decreases in production, which should therefore be rejected for *environmental* (i.e. climate) reasons, amongst others.

The environmentalists whose strategy for the CAP 2020 reform was to get a large shift towards a policy which is 'useful' in their terms, with an emphasis on 'doing good', in fact managed only to achieve a weak 'do no harm' greening in the direct payments, and failed completely to reshape the policy (and the reform may yet be further weakened).

In summary, it is not external pressures that seem to make biodiversity integration in the CAP impossible. The impediment is rather the resilience of existing power structures, which favour their own short-term vested interests, supporting existing production systems over the long-term biodiversity conservation needs, which demand fundamental changes in the future of European agriculture.

Sarah Lumbroso, EFNCP &
Viviane Gravey, IDDRI

Co-operation on an Irish commonage – the Boleybrack approach

Fiona Wheeldon

Blanket bog (Annex 1 habitat 7130) on top of Boleybrack mountain.

In my youth, the rasping call of the corncrake (*Crex crex*) was a common feature as the birds arrived from Africa to spend their summer in the mosaic of hay meadows in the north-west of Ireland.

As time went by, their calling became rarer and rarer and, from the mid-1980s, they stopped coming, and so my children, unlike their father and grandparents, have never heard a corncrake on the farm. I have been a casual onlooker as they declined in my native Co. Fermanagh.

In neighbouring Co. Leitrim, the call of another bird has similarly become rare. On the heather-clad mountains of Boleybrack, numbers of the once common red grouse (*Lagopus lagopus*) had also declined for a variety of reasons, with just three calling cocks recorded in 2007.

However, in this case a group of locals decided to be more than casual observers. Working in co-operation with local farmers, government agencies and conservation bodies, they have put in place mechanisms to improve the condition of the habitat, ensuring that their children will also be hear not just the cackle of the red grouse, but all the other wildlife associated with the uplands of Boleybrack.

The red grouse is associated with heaths, blanket bogs and raised bogs, as its diet is almost exclusively made up of heather (*Calluna vulgaris*). Historically, it was among the most characteristic of Ireland's birds, but the area of suitable habitat has declined as a result of several factors, including decades of damage to Irish bogs by afforestation, agricultural intensification, predation and a lack of any management.

A recent study in Ireland found no grouse on mountain blanket bog sites with less than 25% heather cover. The decline of Irish red grouse also coincides with the loss of many other threatened ground-nesting birds, such as the curlew (*Numenius arquata*).

Boleybrack mountain is an extensive unenclosed upland plateau dominated by active mountain blanket bog and wet heath, with small oligotrophic lakes scattered throughout. The area also contains low rocky cliffs, areas of dry heath and a variety of grassland types, including *Molinia*-dominated heath/grassland, orchid-rich meadows and rush (*Juncus* spp.)-dominated wet pastures.

At least four pairs of golden plover (*Pluvialis apricaria)* nest within the site, and hen harriers (*Circus cyaneus)* use the site for foraging. Both these species are listed on Annex I of the EU Birds Directive. It also has excellent areas of feeding habitat for common snipe (*Gallinago gallinago)* and raven (*Corvus corax)*.

The quality of the habitats led to the site's designation as a Special Area of Conservation for the Habitats Directive Annex 1 habitats blanket bog, wet heath, dry heath, *Molinia* meadow and dystrophic lakes.

The mountain is privately owned and includes commonage, with farmers owning shares and/or grazing rights. Sheep production is the predominant agricultural enterprise.

Red Grouse Project

Members of the local gun club started to look at ways to address the issues affecting grouse numbers. In 2007, they developed a Red Grouse Habitat Management Plan and, with funding from the Heritage Council and the National Parks and Wildlife Service, a Boleybrack Red Grouse Project has been implemented. This has involved what in Ireland is a very unusual partnership between the local sheep farmers, Glenfarne Gun Club, the National Association of Regional Game Councils (NARGC), NPWS, the Golden Eagle Trust, and Coillte.

The key objectives of the plan are to maintain and enhance sensitive habitats through heather management by strimming, controlled burning and targeted grazing, disturbance management, predator control, public awareness, monitoring and reviewing management practices. There is also a moratorium on hunting in the mountains to help establish a viable population.

To date, the project has been successful: the recent annual survey counted at least 85 grouse on the mountain this autumn. This success has been acknowledged nationally and the project was recently visited by the Irish Minister for the Department of Arts, Heritage and the Gaeltacht, Jimmy Deenihan TD. As he said, 'Even more heartening than [the project's] success is the way it has been achieved and the way it has helped to build a bridge between the hunters, nature lovers, farmers and the local community. While conservation costs involve ongoing investment, the main resource here, which is the local people, has delivered outstanding success.'

The Boleybrack Project enjoys the support and goodwill of upland farmers and the wider Glenfarne community and is a good example of the multi-functionality of High Nature Value (HNV) agriculture. Not only does the area supply food in lamb sales but, through manage-

Patrick McGurn

Boleybrack mountain rising above a typical (and undervalued) Co. Leitrim low-intensity mosaic landscape.

ment and co-operation, it is also protecting and enhancing Ireland's biodiversity and helping Ireland to fulfil its European obligations.

It is an important carbon storage area and so helps to offset carbon emissions against present and future agricultural intensification in other areas within Ireland, and contributes to water quality, flood mitigation and recreation. Ironically, despite all these public goods benefits, under the present CAP regulations Leitrim has one of the lowest Single Farm Payment rates in Ireland, less than half that of the more intensive areas.

The future biodiversity of Europe depends on active participation and co-operation of a range of stakeholders and sufficient financial tools needed to prevent abandonment and intensification. The Boleybrack Red Grouse Project is a lovely example of a community effort; with sufficient support, such projects could be developed throughout Ireland, particularly on commonage areas.

Minister Deenihan said clearly, 'I see this project as the standard for best practice in upland management, and I hope to build on it'. His commitment and that of his agriculture colleague will be tried in the scales in the coming 12 months; we hope it is not found wanting.

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Acknowledging montados and dehesas as High Nature Value Farming Systems – Conference, University of Évora 6th-8th February 2013

Montados and dehesas have long been acknowledged as land-use systems of high value, both in natural and in social terms. This is because of their diverse vegetation and land cover, the required balance between the forestry and the grazing uses (both these with the constraining environmental conditions of the Mediterranean region), and also the particular character of the resulting landscapes.

In the face of the current pressure for intensification or extensification of land uses, and in order to secure a management which respects the system balance and guarantees the maintenance of the above mentioned values, there is an urgent need to set up priorities in policy-making which acknowledge the montados and dehesas as complex and unique systems. The High Nature Value concept provides a framework for the overall classification of these systems and for promoting their specific consideration in policy-making within the various scales of governance.

Curiosidad, Creative Commons Licence

Dehesa, Huelva province, Spain.

For this, and in order to identify which montados and dehesas do really secure the non-production values that are valued by society today, there is an urgent need to identify criteria and select adequate indicators or other tools that make the identification and monitoring a straightforward task.

In addition to this, in order to guarantee the balanced management of these systems, specific consideration should be defined in policy design, both at a European and a national and/or regional level. The often conflicting goals and tools of sectoral policies, together with fluctuating markets for some of the products of the montados and dehesas, result in a tension for land managers and in unforeseen consequences for the future balance of these systems. In 2013, the application at national level of the policy orientations defined for the CAP 2013 will be under preparation, and a discussion at the start of the year will make it possible to draw up guidelines that could contribute to a better targeting of the measures and schemes.

Aiming to gather the experience and knowledge already developed by different teams in Spain and Portugal (and other Mediterranean countries) dealing with these complex silvo-pastoral systems, this conference, which is organised by the University of Évora and supported by EFNCP, will address these two topics: classification of montados and dehesas, and the policy implications. For booking information, please use this link.

Lies, damned lies and statistics…

It was late 2008. Suddenly, many of the farmers my colleagues and I had worked with during the previous four or five years started to call us; they were being penalised by the Paying Agency. For the first time in my career, I felt truly betrayed by the system.

Back then, I was working for the WWF Danube-Carpathian Programme and we had just finished a project with EFNCP studying three HNV farming regions in the country, and my colleague Vyara Stefanova was head of the Agri-environment (AE) Unit in the Ministry of Agriculture.

In early 2008, and with our encouragement, the farmers had submitted applications for the 'Maintenance of HNV grasslands' AE option, which we had both done so much to develop. Now they were being accused of over-declaration, with the prospect of penalties for the next three years.

This was the first year of implementation of AE measures and they were to have been the beneficiaries. Needless to say, they never received any benefit from the measure. I will return to this issue later, but meanwhile, back in 2008, we were shocked and our first reaction was to try to understand what had happened and how.

Before explaining the issue, I need to give you some more background. In 2007, Vyara, in her role as head of the AE unit, had secured funding for the verification and refinement of the draft JRC-EEA map of HNV farmlands in Bulgaria.

Although we had, along with other NGOs actively working in the field and experts from the ministries of agriculture and environment and research institutes, been for some time discussing whether the JRC-EEA approach was the most appropriate to use, we decided, taking into account all its weaknesses, to put a concerted effort into making it work for Bulgaria, not least so that the AE measure could open for applications.

Conservation NGOs and academics provided all the available geo-referenced biodiversity datasets (free of charge!) and we produced the biodiversity layer for the country. Our approach was to overlay the biodiversity map onto the Land Parcel Identification System (LIPS, which underlies CAP payments) and thus to identify all HNV land.

We had to select which LPIS codes (Box 1) could potentially be HNV farmland. As the reader can see, we did not include physical blocks with code 6, only those with codes 1, 2, 4 and 5. It was this decision to exclude Code 6 which would later come back to haunt us. But that's what the experts working on LPIS advised and we all read the definitions and agreed. Everyone was satisfied with the results – the numbers (Table 1) all made sense, given what the agricultural statistics of the day were telling us.

Box 1 Definitions of LPIS physical blocks in 2007.

Code	Definition
1 AL	**Arable land:** lands interpreted from the orthophoto map as cropped, ploughed (fallows), harvested, rice-fields, greenhouses, strawberry or vegetable gardens with a total area equal to or larger than 0.1ha
2 PC	**Permanent crops:** land interpreted as vines, orchards or other permanent crops with a total area equal to or larger than 0.1ha
4 PG	**Permanent grasslands**: lands interpreted as permanent grassy areas which might be: natural meadows; pastures, pastures with shrubs, forest pastures, glades whose total area is equal to or larger than 0.1ha; at least 50% of the areas must be permanently covered by grass, and tree and shrub density must be below 50 trees/ha (except nut trees and orchards)
5 MU	**Mixed utilisation:** lands interpreted as areas with permanent borders, but with mixed land utilisation – arable land, greenhouses, strawberry or vegetable gardens, permanent crops (including partially eradicated permanent crops), utilised natural meadows, pastures with a total area equal to or larger than 0.1ha.
6 OAL	**Other agricultural land:** lands interpreted as evidently abandoned arable land (not cultivated for more than two years); agricultural lands >0.01ha not included in physical blocks with codes 1-5, due to the area being less than minimum size for these codes (0.1ha)

Table 1 Potential HNV farmland in Bulgaria as identified in 2007 (Source: Annex 5, BG RDP)

Physical block code in LPIS	Total area of HNVF (ha)
1 Arable land	359,611
2 Permanent crops	40,155
4 Permanent grasslands	951,256
5 Mixed utilization	279,013
TOTAL	1,630,035

What had happened, in fact, was that farmers were told that they had to identify *all* land they use on the LPIS maps in their regional offices (as the Regulation implies they should). But when administrative checks were carried out by the Paying Agency, it turned out that most of the pastures actually fell under code 6, making them ineligible not only for direct payments but also, thanks to our decision, for AE.

The farmers were thus accused of (substantial) over-declaration, which led to large penalties, often as much as the total value of the subsidy.

Later on, the coding was changed, the number of sub-codes was increased and pastures were redistributed to other codes. But problems with HNV grassland eligibility remained.

At some point, land in Good Agricultural and Environmental Condition (GAEC) was moved to a separate layer in the system; any land outwith this layer became ineligible for support. Unsurprisingly, many scrubby HNV pastures were excluded (see *La Cañada 22*), but exactly how many is a mystery. Even while she was still in the ministry, Vyara could not find out the area of pastures declared to be in GAEC – any on land in LPIS seemed to be secret, even within Government.

Looking for answers

Vyara and I now work for EFNCP and we continue to try to understand how this mess came about. Why are so few HNV grasslands being supported and why are the farmers managing them being penalised?

The administration now says that the AE are too complex for farmers to understand. In reality, it is a simple measure and, indeed, it is sometimes even portrayed as being successful.

But even if complexity is the reason why farmers are penalised or don't enter

the scheme, how does the Government explain why there are so many mountain farmers who are said to be beneficiaries but then seemingly receive *no* subsidies for their pastures? The annual RDP reporting for 2011 shows that 37.9% of the measure's beneficiaries (i.e. those whose applications have been approved) receive BGN0! Is that really true? Can 10,700 farmers really be receiving not one stotinka for their participation in the measure?

One thing that we now know for sure is that the definition of permanent pastures is a perennial and very serious problem whose roots lie in the EU Regulations. EFNCP has written a lot about it and a Bulgarian case study is available online. We really hope that it will be changed in the next programming period.

But another equally serious problem is that of national datasets and the extent to which they mean anything on the ground. In 2007, when Bulgaria joined the EU, only 715,000ha of pastures were declared by the Bulgarian authorities, or just 38% of all pastures in the country, according to national statistics. So, from the very first day of membership there were two different datasets, each with its own representation of 'reality'.

In 2009, the figure declared to the EU was further reduced to 436,000ha – only 25% of the original total, according to national statistics, but also a 39% decrease on the initial area declared to the EU. At the same time, the *national* statistics also showed a reduction in pasture area of 157,264ha, or 8.4% of their extent in 2007.

By 2011, the area of all pastures had reduced by 10.6% as compared to the status in 2007, according to the national figures (and we have no information on the area declared to the EU).

From a policy perspective these figures should imply some action on the part of Bulgaria to restore the ratio of permanent pasture in total agricultural land or, failing that, of some enforcement action by the EU. We are mystified why none has been forthcoming.

A third and completely separate dataset is the cadastre of agricultural land, which at the moment has no connection to the databases related to CAP support, which are based on the aerial photos as interpreted in the LPIS and land use as declared by farmers.

However, the cadastre reflects the land-ownership documents held by farmers and other landowners. Significantly, it is also the main database used by the Ministry of Environment for assessing the land use in national protected areas and Natura 2000 zones. The lack of physical and logical connection between these two datasets is really worrying, to say the least. In practice, it means that the two key administrations for HNV pastures and Natura 2000 zones speak completely different languages when it comes to farming land use, as illustrated on the national level by Table 2.

Yanka Kazakova

A flock of sheep and goats in Code 6 OAL land (see Box 1), Elena municipality.

A sub-set of the agricultural statistics is the 2010 Agriculture Census data. It shows that in 2010, 382,023ha of permanent pastures were in actual individual use and 876,000ha in common use, making a total of 1,258,023ha.

Taking all these numbers into consideration, we estimate that around 450,000ha of pastures are at least threatened by abandonment.

Lastly, I would like to present the figures for permanent pastures declared in direct payments applications (the simplest of support measures, let the Ministry note), which were recently presented for the first time by the Ministry of Agriculture (Table 3). (One point of caution – this is the area of pasture claimed for support, but we don't know how many were approved, nor how many received more than BGN0!) The trend is not really surprising, all things considered.

The Ministry also reported that the total area of permanent pastures in IACS (LPIS?) is 875,255ha.

I end by setting out clearly what these most recent figures are saying:

- 1,258,023ha in actual use.
- 875,255ha eligible for support
- 333,819ha claimed for support

How can anyone say that there is not a problem?

Yanka Kazakova; yanka@efncp.org

Table 2 Permanent pastures (ha) as recorded and reported by the three official datasets in Bulgaria.

Year	Agri-statistics	Land cadaster	LPIS-GAEC
2007	1,876,292	?	715,000
2008	1,828,865	1,065,680	?
2009	1,719,028	?	436,000
2010	1,701,990	1,042,813	?
2011	1,678,308	?	?875,255

Table 3 Permanent pastures claimed for support.

Year	Area (ha)
2007	438,180
2008	548,071
2009	429,078
2010	419,626
2011	372,495
2012	333,819

ECA report on Single Area Payment Scheme

The latest in the always stimulating series of special reports (http://eca.europa.eu/portal/pls/portal/docs/1/18730745.PDF) by the European Court of Auditors (ECA) has as its subject the Single Area Payment Scheme (SAPS), used to implement direct payments in ten of the eastern Member States.

The audit focuses on:

- the implementation of the main elements of the scheme, including the definition of the beneficiaries and the definition of eligible land;
- the contribution of the scheme to the objective of supporting farmers' income in the new Member States; and
- preparations for the transition to the Basic Payment.

SAPS is intended to be replaced in the next CAP by a new direct payments system common to all EU Member States, so many of the details are of no more than passing interest by now. Nevertheless, many of the observations will continue to be relevant and will raise significant concerns, a number of which are familiar to readers of *La Cañada*.

The tenuous link between maintaining the land in GAEC and agricultural activity is highlighted once more, with examples given of land on which there was no record or proof of farming having occurred being supported.

The Court makes the point that payments are made without any reference to the amount of public goods provided, which suggests that higher payments should go to more extensively-managed farmland. At the same time, it presents some evidence that SAPS has led to an increase in land values (31% of the payment going from land users to landowners in the form of higher rent, according to one Hungarian study).

It found that SAPS aid had been paid to landowners who had no agricultural activity on the land in question, including hunting clubs, airports and real estate companies. In some Member States, such claims were made by public bodies, for example on common land (in Hungary, the State is the largest claimant!). In others, the legal bodies recognised for the purpose of claiming on communal land exclude some of the actual users from membership.

Yet the ECA seems to find difficulty, as always, in distinguishing low-intensity use from no use. Their image (photo 2) of land on which there is, they claim, no evidence that any agricultural activity had *ever* taken place, is to this reader quite clearly one of semi-natural vegetation (although the land certainly appears underused). Photo 4, of 'unutilised' semi-natural grassland in Hungary, may indeed be unused as they claim, but it could equally be about to be used!

They note that in Slovakia the authorities had identified around 100,000ha of permanent grassland (around one fifth of the total permanent grassland area) where they had doubts as to whether they are fully in agricultural use, and considered reducing the per hectare SAPS payments to take account of the unutilised parts of the parcels. It is not clear whether the Court thought that this was a good thing or a bad thing.

A challenge for the new CAP

Preparation for the new CAP seems to have been minimal in most States. One issue which will need to be faced is the reassessment of land eligibility in the light of changes in the permanent pasture rules. Under SAPS, eligible land was fixed once and for all in all the new Member States, except in Romania and Bulgaria.

We agree with all the Court's conclusions, not least that the payments should somehow be related to delivery of public goods through actual farming activity. To EFNCP, the story is clear and the message obvious – the management of marginal land is uneconomic without assistance, but to avoid disproportionate increases in land rents, any payments must be closely linked to carrying out those loss-making activities.

But this means that the biggest spend could go on exactly the land which the Court is seemingly itching to exclude decisively from the system – land with bushes, land which is used by mobile flocks, extensively-grazed semi-natural grasslands and the like. Making the system work on such areas is a challenge – we acknowledge that – but we, like the Court, think the policy should actually be achieving its stated aims, so it is a challenge which must be faced head-on.

Gwyn Jones; gwyn@efncp.org

Noticeboard

Romania – Poland transhumance celebration

Many of the pastoral traditions of the northern Carpathians were introduced by Vlach (Romanian) shepherds in the late Middle Ages, as the name of the Wallachian Moravian region (Valašsko) in the east of the Czech Republic attests.

To celebrate this common heritage of shepherding, the Pasterstwo Transhumancyjne Foundation from Poland and Asociaţia Transhumanţă from Romania are leading a project to recreate the 1,400km route walked by the old flocks from Romania, through Ukrainian Ruthenia, Poland and Slovakia to the Czech Republic.

The project will bring together people who never meet in the normal run of things, but share so much – a common Carpathian workplace, skills passed on through the generations, a rich cultural heritage and a set of High Nature Value farming systems which adds to the richness and uniqueness of the mountains.

Above all, the priority for the project is the sustainable development of the mountain areas through:

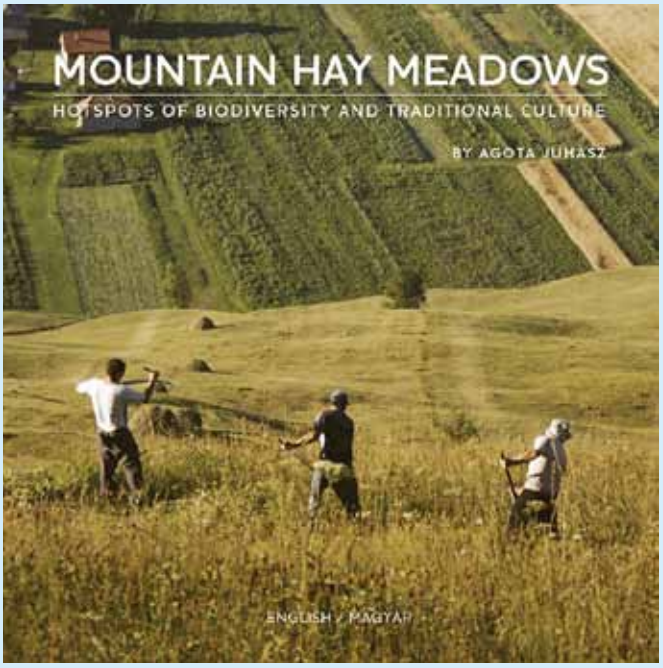
- the promotion of regional food products i.e. traditional sheep cheeses and meat products, and handmade products and folk crafts;
- strengthening transnational co-operation under the umbrella of the Carpathian Convention, not least in the promotion of culture and traditions in the Carpathians;
- highlighting the ecological and cultural values of the Carpathians and of the role of a revitalised pastoral farming in restoring the balance of man, sustainable farming and nature to bring measurable economic benefits within the system of sustainable management the communities of the mountains and foothills;
- increasing mutual awareness and co-operation between institutions and organisations protecting nature and shepherds.

The project will involve wide co-operation with NGOs, local governments, local institutions, media and sponsors. The popularisation of this project will also be carried out by organising a series of cultural events and discussion panels along various parts of the route, or near the transhumance route.

The organisers are very keen to receive offers of assistance for realising not only this year's celebratory journey but subsequent projects. For further details and to get involved, contact Andrew Tokarz carpathia@att.net

Mountain hay meadows DVD

Traditional hay meadow management in Transylvania created and maintains outstanding biodiversity and



landscape, provides healthy food and sustains rural economies and communities. This award-winning film by Ágota Juhász, part-sponsored by EFNCP, documents a disappearing lifestyle and describes the contradictions and challenges in European policies aimed at protecting these threatened habitats and the small-scale farmers who manage them.

Copies of the film are available in English and Hungarian from Barbara Knowles barbara.knowles@yahoo.co.uk for £10/$12 in UK or US and €10 elsewhere.

All profits support the work of the Pogány-havas Association www.poganyhavas.ro

Make hay in Transylvania. International Haymaking Festival 11th-18th August 2013

Make friends, have fun, learn new skills and help to preserve valuable mountain hay meadows and their plants, wildlife and traditions in one of the last large-scale medieval landscapes of Europe.

This is a great opportunity for nature lovers and those interested in traditional culture and sustainable living to learn about the connections between nature and farming by doing physical work alongside local people and participating in the art and science of hay making and related skills.

Your visit will help our projects to improve rural incomes, support traditional agriculture, understand the ecology and biology of outstandingly biodiverse meadows, and identify and protect key species and habitats in need of conservation.

Organisers: Attila Sárig and Pogány-havas Association

Sponsors: Barbara Knowles Fund, Global Environment Facility Small Grants Programme and Naturvernforbundet i Buskerud from Norway. www.treasuresoftransylvania.org

Places are limited, so send expressions of interest to barbara.knowles@yahoo.co.uk

Reform of the CAP 2013 and achievement of the biodiversity and environmental goals

This report is the result of in a co-operative research project between three German research institutes (IFAB Mannheim, ZALF Müncheberg and HFR), funded by the German Federal Agency for Nature Protection (BfN) with funds from the Federal Ministry for the Environment, Nature Conservation and Nuclear Safety. The study investigated the effects of the proposed future CAP on biodiversity and the environment, especially the effects of the CAP Greening and the budget allocation.

The study concludes that:

- Greening is a most important proposal for broad scale anchoring of ecological benefits in the CAP. In order for greening to result in real improvements, it must above all be mandatory and implemented by all farmers, in every part of the countryside, especially in the intensively farmed regions.
- In terms of biodiversity, the proper implementation of Ecological Focus Areas (EFAs) is paramount.
- There is a need to shift at least 15% of the Pillar 1 budget to Pillar 2, earmarked for an adequate management support of EFAs, Natura 2000 sites and HNV farmland (fully funded by the EU, thus giving an incentive to Member States to implement adequate programmes).

A big 'Green' mess

Two items of interest to readers will be Alan Matthews' reflections on the Council's Greening discussions on capreform.eu and a related briefing note by IEEP on the potential double-funding issues which lie ahead.

Support EFNCP's work – donate now at www.efncp.org

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

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