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Common Agricultural Policy “Health Check”

Our expertise

We are one of the few organisations in Britain with genuine expertise in the field of farmland wildlife conservation. We have had research programmes on this subject since the 1960s and, with field experiments and trials, we developed many of the options in the current suite of agri-environment schemes.

We also run a fully commercial research and demonstration farm, and we advise farmers on conservation countryside.

Our concerns

Overall we broadly approve of the approach being proposed by the UK (*Common Agricultural Policy “Health Check”; UK response to the communication from the European Commission*).

Our principle concerns with the current “health check” are:

- Making sure that agri-environment measures are strengthened not weakened, and that they remain competitive in the face of strong commodity prices.
- Ensuring that the incidental environmental benefits of set-aside are retained as far as possible. Set-aside benefited the typical farmland animals that once were common on traditional farms but were squeezed out by intensive methods. Animals like partridge, lapwing and brown hare.

Pillar 1 – Environmental Aspects

Cross compliance

We think the changes to cross-compliance suggested by the Commission are helpful, but do not go far enough:

- We support the removal of cross-compliance measures relating to the Birds Directive and the Habitats Directive. In Britain, farmers (especially tenant farmers) may have no direct control over many activities that are governed by these directives.
- We welcome the proposal for a new standard under GAEC for the establishment of buffer strips adjacent to water courses. As well protecting aquatic habitats it will also simplify the approved use of some pesticides for adjacent crops.
- We welcome strengthening the requirement to retain existing landscape features.

However, contrary to what the Commission implies, none of the above will compensate for the loss of wildlife habitat that set-aside formerly provided. We think the only sensible way to compensate for this is to retain a small fraction of the former set-aside area and use it more effectively for conservation. We term this *Conservation Land*.

Conservation Land

Although it was never designed as a conservation measure the wildlife benefits of set-aside became clear over time. Nevertheless some set-aside had limited value because;

- It was amalgamated into a single block away from the rest of the farm
- It was sprayed with herbicide at the earliest opportunity so providing poor habitat.
- It was left to develop into a thick grass sward with little diversity.
- It was used for industrial crops

We think that we could get as much environmental value from an area of land equivalent to a small fraction of past set-aside, if it is managed deliberately for conservation. We propose that 1% of the farm cropping or grazing area, in addition to the retained landscape features such as hedgerows, woods and ponds, should be managed under open-field conservation regimes.

Unfortunately policy decisions on set-aside have typically been made without any preliminary environmental research so although we have undertaken no specific research programme that points to the conclusion that 1% is enough, our knowledge of wildlife ecology suggests to us that a small well managed fraction would be better than larger areas that are poorly sited.

Thus we think the land that contributes to this small fraction will need to fit certain criteria so that it is well distributed and sited and fits with the ecology of species like lapwing and brown hare. We think this *Conservation Land* should be distributed in patches of one hectare such that:

- a) The average widths of patches are not less than 20metres. (Open country species like lapwing, stone curlew and brown hare are vulnerable to predators on small patches of ground)
- b) Patches are not sited within 50metres of any woodland. (Brown hare, lapwing, stone curlew and grey partridge all dislike resting in areas overlooked by woodland)
- c) Individual patches must not be less than 500 metres apart. (Animals like hares often range over distances of a kilometre so spacing *Conservation Land* at these intervals should make them accessible to most individuals.)

We would expect that member states will want to develop regimes for *Conservation Land* that are appropriate to the ecology of different regions. In Britain we think three regimes are appropriate:

Rotational fallow. Following a cereal crop which has not been treated with a pre-harvest herbicide, the area is left as stubble until mid May, after which it can be treated with herbicide, but should not be cultivated until mid July after which it can be brought back into rotation.

This overwinter stubble provides winter cover for birds like partridge and flocks of finches and, as the weed flora develops, some grazing for herbivores like hares and deer.

Meadow. Permanent areas left as grass or natural regeneration, or re-seeded with a wild grass/wild flower mixture. After establishment, no fertilizer or pesticide should be used. To be managed either by mowing annually after mid July and/or grazing between September and March.

Traditional meadows, especially when grazed, encourage insects such as flies and beetles that emerge to provide food for swallows, house martins and horseshoe bats. They also provide summer grazing for hares and deer when arable crops provide none. With time floral diversity improves encouraging bees and butterflies.

Wildlife crop. Mixtures of seed and cover crops used to provide food and cover for birds. Species such as kale, quinoa, or triticale should be used in combination. Management will require cultivation and re-drilling bi-annually, as well as appropriate fertilizer and pesticide applications. Because of the high management costs, patches of this option need only be half the size of the meadow and rotational fallow options i.e. one half of 1% of the farm area. Costs of management could be funded under Pillar 2 agri-environment schemes.

Many farmland birds like finches, sparrows, doves and gamebirds relied on spilt seed left after harvest. Modern harvesting machinery leaves very little for these birds to glean. Providing special seed crops helps compensate for this loss as well as providing good habitat for mice, and shelter for thrushes.

Provided this requirement is no more than 1% of farmed land we think that it is reasonable that it should be obligatory to all farmers in receipt of the Single Farm Payment.

Pillar 2

We support the development of the agri-environment measures under the Pillar 2 Rural Development Programme. We are less convinced of the value of the Axes 1 & 3 of the Rural Development Programme.

While Pillar 1 remains in place, and is substantial, we support modulation as a means to pay for Pillar 2.

We concur with the UK government that further modulated funds should remain within the member states and all states should be required to modulate to similar levels.

We support using Rural Development Programme funds to progress work on climate change, renewable energy, water management and biodiversity.

While we note that the Commission's Table of operations is non-exhaustive, we observe the following:

Climate change:

Afforestation. In some situations this may have adverse effects. For example, plantations of conifers on moorland with blanket bog could cause erosion of peat and release of CO₂. In upland river catchments plantation forestry could reduce river flows with consequences for water supply and migratory fish.

Renewable energies:

Energy crops and biomass. . We do not believe that biomass or biofuel production should be subsidised any more than food should be. However, we are in favour of kick-starting small scale farm operations that make use of farm waste or better use of existing woodland (which in historic times provided the bulk of Britain's fuel).

Water management

Agro-forestry: It is not clear how this would improve water management in a North European context. It is more likely to suit Asian or African desert landscapes where shade can reduce evaporation.

Biodiversity

Farming: Certain styles of traditional farming (not necessarily organic) benefit wildlife. These are generally mixed farms with crop rotations that build soil fertility. At present these farms are poorly supported through agri-environment schemes and are increasingly uncompetitive against modern systems which tend not to support wildlife. In the meantime we would support the use of provisions under Article 69 for this purpose.

Conclusion

We think the 'health check' is a good opportunity to make some small, but significant, changes which will substantially improve environmental protection under the Common Agricultural Policy.