



REFORM OF THE COMMON AGRICULTURAL POLICY:

EURAF's POSITION PAPER ON COMMISSION DELEGATED REGULATION

07 January 2014

Objective: Confirming and strengthening the positive provisions of the basic act on agroforestry

EURAF has welcomed the provisions on agroforestry included in the reform of the Common Agricultural Policy (CAP). The basic act represents a major step forward giving new momentum to this innovative production system.

Delegated acts should be in line with the inter-institutional agreement. Furthermore, they should strongly support agroforestry which represents one of the most promising greening measures of the new CAP.

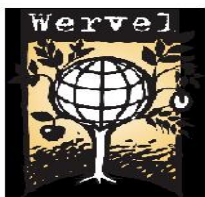
For further information, please contact:

Mélanie Lamaison, AliénorEU, www.alienoreu.com, +32 2 791 76 10, +32 491 51 23 40

melanie.lamaison@alienoreu.com



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samen sterk voor een gezonde toekomst

➤ Eligibility criteria

For hectares of agro-forestry, the areas that should be taken into account are the total area of arable land, i.e. areas of crops and trees. It is of paramount importance to continue to make tree lines eligible. If not, not a single hectare of agroforestry will be planted in Europe during the next years.

Rationale:

As stated by Article 23 of the Regulation on rural development (17 December 2013, L347/487), “agro-forestry systems mean land use systems in which trees are grown in combination with agriculture on the same land”. Consequently, agro-forestry areas should be seen as a whole system which provides multiple ecological benefits.

Furthermore, eligibility rules should be consistent with meeting the challenges of climate change and biodiversity loss and should not penalise high nature value farming (i.e. the presence of trees).

➤ Eligibility of trees in pastures

It is critical to make a distinction between grazable and non-grazable trees and shrubs. Grazable trees and shrubs should be eligible.

Rationale:

The Regulation on direct payments (17 December 2013, L347/608) lays down that “permanent pastures may include other species such as shrubs and/or trees which can be grazed”. Moreover making grazable trees and shrubs eligible is essential since it has been proven that on wood pasture systems, trees and shrubs are an integral part of the forage resource and farming system. In other words, they are fully productive elements.

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➤ **Eligibility : Maximum width of hedges**

EURAF suggests that hedges up to 6 m wide should be fully eligible (not 2 m).

Rationale:

Narrow hedges have a low ecological value. Thick hedges have a very high ecological value. Using a 6 m width would be consistent with the width of hedges that can be included in the EFA.

➤ **Maximum density of trees**

EURAF is making three suggestions:

- 1) In line with Article 23 of the Regulation on rural development (17 December 2013, L347/487) which lays down that “minimum and maximum number of trees per hectare shall be determined by the Member States”, the maximum number of trees per hectare should be consistent with the maximum number of trees per hectare for the second pillar as decided by each Member State.
- 2) The maximum density of trees should not exceed 200 trees per hectare.
- 3) The maximum density of trees should not exceed 100 trees per hectare with more than 4 meters crown radius.

Rationale:

Putting a limit at 100 trees per hectare is too restrictive and would exclude many traditional and high nature value agro-forestry systems in the UE. It should be stressed that with 200 trees per hectare, agricultural activity remains predominant.

➤ **Hedges**

When determining areas where the agricultural parcel contains landscape features and trees, hedges should be eligible whether or not they are part of traditional agriculture practices. Consequently, the reference to “traditional practices” should be deleted.

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Rationale:

Making hedges eligible only when they are traditionally part of good agriculture practices is too restrictive. The challenge is notably to plant hedges in regions where they are absent and this operation should be supported.

➤ Ecological Focus Areas

EURAF has welcomed the inclusion of hectares of agro-forestry in the ecological focus areas (EFA). However, EURAF would like to underline that agroforestry is a productive system, and this should not be denied by the inclusion in the EFA. Farmers should therefore be allowed to collect tree products from agroforestry trees such as biomass or timber. Furthermore, agro-forestry plots which have not been subsidised by the second pillar and for which farmers have invested their own money should not be penalised. It should be possible to include these plots in the EFA.

For further information on agroforestry:

<http://www.agroforestry.eu/>

<http://www.agroforestry.de/>

<http://www.agroforst.de/2-definition.html#kurzdef>

http://www.agroof.net/agroof_dev/agroof_safe.html

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