EURAF's POSITION PAPER ON

THE DRAFT GUIDANCE DOCUMENT ON THE LAND PARCEL IDENTIFICATION SYSTEM UNDER ARTICLES 5, 9 AND 10 OF COMMISSION DELEGATED REGULATION (EU) NO 640/2014

13 October 2014

EURAF, the European Agroforestry Federation, welcomed several provisions on agroforestry included in the Common Agricultural Policy (CAP) 2014-2020. Although progress still has to be made, the basic act on direct payments represents a step forward giving new momentum to this innovative production system.
EURAF considers that delegated acts and guidance documents should continue to strongly support agroforestry which represents one of the most promising greening measures of the new CAP.

Agroforestry, the practice of adding trees to farmland, is a suite of land management systems uniquely qualified to combine high agricultural productivity with strong environmental objectives. Hundreds of studies document that adding trees to fields and pastures boosts overall productivity and generates additional biomass, and thus potentially boosts incomes. These systems offer a suite of other benefits useful to farmers, either because they increase land quality (trees in fields maintain and restores soils, they limit wind and water erosion), or because they reduce certain costs (fertilizer and phytosanitation use can be lower). Other benefits are valuable public goods, too: enhanced carbon capture, increased biodiversity protection, and water purification and percolation are the most obvious ones.

Rather than replacing existing agricultural practices, agroforestry enhances their productivity, sustainably boosting farmers' incomes.

> **All trees, including chestnut trees and oak trees, should be considered as grazable trees and should be part of the eligible area**

EURAF is deeply concerned by the following provision: "*chestnut trees and oak trees, even if their fruits are used on the ground for foraging farm animals, are not considered as species which can be grazed. They should thus be considered under the rules of Art. 9 and Art. 10 of R.640/2014*". (point 2.4.1 - *In relation to the definition of permanent grassland*)

EURAF thinks that all trees, including chestnut and oak trees, should be considered as grazable trees when they are an essential part of the forage resources of silvopastoral systems. For instance, in the Dehesa region, there is roughly 1 million hectare of holm-oak where livestock gets roughly half of the forage from the trees (acorns and browse). The current provision would exclude numerous silvopastoral systems, commonly recognized as being environmentally, economically and socially important.

> **The size of the features and trees should not be a criteria for determining the eligible area using the pro-rata**

EURAF disagrees with the following provision: "*Ineligible features and trees with a size above 100m² which are inaccessible for grazing animals (i.e. there is no obvious access to animals) should be delineated in the LPIS reference layer and deducted from the MEA of the RP beforehand and they should be excluded when applying the pro-rata system.*" (point 2.6.2 *Determination of the eligible area using the pro-rata*)

EURAF is convinced that trees and shrubs should be eligible when they either provide forage resources (or when marketable fruits are harvested) or when they do not prevent the growth of pasture underneath. Furthermore, when the pro-rata system is applied, the size of the trees should not matter. The current provision will notably exclude large trees that are important for tree regeneration, animal shelter, biodiversity and soil protection (erosion, soil fertility…) etc.

With 250 members from 18 different European countries, EURAF promotes the use of trees on farms and in pastures throughout Europe's many different environments.

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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