



Ms. Mayra Calega

COPA

Chair of the Direct Payments and Greening Civil Dialogue Group

18 November 2014

Dear Ms Calega,

The European Agroforestry Federation (EURAF) advocates the introduction, restoration and use of trees and other woody plants in fields and pastures, so as to increase productivity of agricultural land and boost the environmental sustainability of farming practices. In this regard, we have welcomed several provisions on agroforestry included in the Common Agricultural Policy (CAP) 2014-2020. However, we are also aware of certain rules which could hinder the development of agroforestry in Europe, such as the recently approved LPIS guidance document.

The final version of the Guidance Document on the Land Parcel Identification System (LPIS) provides details to Member States on how to implement Articles 5, 9 and 10 of Commission Delegated Regulation (EU) No. 640/2014. Unfortunately, it includes a restrictive view on the "eligibility" of trees, which may have a serious impact on the direct payments received by farmers for their agroforestry parcels. Indeed, regarding the new definition of permanent grassland, which *may include other species such as shrubs and/or trees which can be grazed*, the guidance document clarifies specifically that *this part of the definition should be understood as the fact that the features "which can be grazed" should be actually accessible to farm animals for grazing for their full area*.

According to what we discussed in the last Direct Payments and Greening CDG meeting, it would seem that trees with high leaf-fodder value (e.g., ash, birch), or bearing edible

For further information, please contact:

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nuts (e.g., oaks, chestnuts) may be considered to be "ineligible" just because their crown is beyond the reach of livestock, irrespective of the fact that leaves and nuts are seasonally consumed by livestock, as shown in the examples below:

- In *dehesas* and *montados*, common in the southwest of the Iberian Peninsula (<http://www.agforward.eu/index.php/en/dehesa-farms-in-spain.html>), trees are pruned regularly to feed livestock on leaves, particularly in dry years when pasture is very scarce, while the nutritious acorns are consumed by free-ranging livestock, typically Iberian pigs. Hams obtained in these silvopastoral systems are particularly healthy due to the high antioxidant content of acorns.
- In the southeast Balkan Peninsula *Q. ithaburensis* ssp. *macrolepis* forms traditional silvopastoral systems of great value in the past. Even nowadays its large acorns, consumed directly from the ground, represent an important feed source for domesticated livestock but also for free grazing hogs.
- Tree pollarding (coppicing at 2-3 m above ground) is an ancient technique to produce wood or fodder while protecting regrowth from browsing animals. Ash trees constitute one of the best and most common cases of pollarded trees across Europe, due to the value of their fodder and wood. Besides, pollarded trees are an excellent habitat for a number of protected species and have recently been the object of an EU-funded Life project (<http://www.lifetrasmochos.net/>).

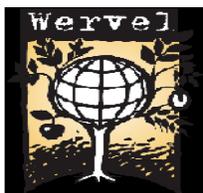
EURAF believes that trees with high fodder value should be fully "eligible" when applying the definition of "permanent grassland", even when they are out of direct reach of animals, since they are an essential resource for grazing animals as well as a key element for the sustainability of the system. Otherwise, it is EURAF's concern that a restrictive view on the new definition could lead to the removal of trees in the countryside, since they may be perceived as an obstacle to receive direct payments of the new CAP.

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Therefore, we would like to request the modification of the Guidance Document on the LPIS, notably to remove the contents that limit the “eligibility” of trees to their being *actually accessible to farm animals for grazing*. We are available to discuss this further and/or to provide more examples if requested by the Commission.

Yours sincerely,

M^a Rosa Mosquera-Losada
President
European Agroforestry Federation (EURAF)

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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