

## **Farm Woodland Forum Response to the EC on the Green Book on Market Based Instrument for Environment and Related Policy**

**From:** Gerry Lawson, on behalf of the Farm Woodland Forum

**Sent:** 29 May 2007

**Subject:** EU Consultation on market based incentives

<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:52007DC0140:EN:NOT>

The Farm Woodland Forum wishes to respond to only one question in this consultation, but we very much welcome this thorough review of the Market Based Incentive approach.

### **Question: What is in the light of national experiences, the best way to advance the process of reforming environmentally-harmful subsidies**

We are aware of a particularly damaging effect of the current interpretation of Single Farm Payment Rules. Farmers can only claim payments on land which was declared as agriculture in the base years of 2000 - 2002 if there are less than 50 trees per hectare (i.e. 'woodland' is not eligible). Yet grazing or cropping is traditionally practiced with tree-densities much higher than this level. In some countries this interpretation is causing trees to be removed, and invaluable traditional orchards, parklands, forest-grazing, streuobst, or foret-vergeres are being destroyed.

Trees outside the forest are vital for healthy biodiversity and landscapes. Yet the blind interpretation of an arbitrary 50 trees/ha rule by traditional agricultural departments is a) threatening traditional land uses and b) limiting the opportunities for new planting of agroforestry or conventional forestry on farmland.

We urge that the Irish solution of SFP entitlement 'stacking' (i.e. allowing up to 50% of a farm's area to be planted with trees and transferring the SFP entitlement to the remaining area) should be used across the whole EU.

This will ensure diversity of land use: with attendant benefits for biodiversity, erosion control, environment, fibre and energy production.

We also recommend the use of linked biophysical and socio-economic modelling of farming and forestry options on defined land ecotypes - allowing effects on farmer's preferences to be tested, BEFORE market based incentives are introduced. It is too dangerous to develop MBIs by 'trial and error'. The EU SAFE Project (<http://www.montpellier.inra.fr/safe/>) developed initial tools for this approach. These should be extended.