

To: Director Pierre Bascou  
Directorate-General for Agriculture and Rural Development  
Sustainability and income support  
Rue de la Loi 130  
1000 Brussels  
Belgium

**Dear Mr. Bascou**

One of the 9 specific objectives of the common agricultural policy in the coming period 2023-27 is to “contribute to halting and reversing biodiversity loss, enhance eco system services and preserve habitats and landscapes”. In the political agreement of the future CAP there is a range of new requirements and instruments in pillar one, that can potentially contribute positively to this objective.

If the full potential is to be used in the best possible way, it is important that the rules for GAEC 8, for eligible areas and for eco schemes can be implemented nationally in a way that both contributes positively to biodiversity and reduces complexity of the regulation on agriculture.

Currently we experience some challenges in the draft delegated and implementing acts, and in the interpretation of the basic regulation. We fear that these challenges will both increase complexity and decrease the biodiversity and climate contribution of the measures. The challenges are as follows:

**Presence of animals in biotopes under GAEC 8 and eco schemes enhances biodiversity**

Biotopes on arable land can be used by the farmers to fulfill the commitment to establish 4 pct. of arable land as non-productive areas or elements (GAEC 8). Also new biotopes on all agricultural land can be rewarded in an eco-scheme. Non-productive elements such as biotopes can be placed in areas which are already grazed by animals. Here the bushes and trees will also give shelter and shadow for the animals. This is also crucial in organic production.

At the same time, it is well known that to enhance biodiversity in a large variety of habitats, animal presence and extensive grazing is a crucial factor, and it is beneficial for carbon sequestration. Hence it is extremely important that grazing animals can have access to areas used to fulfill the obligation to establish 4 pct. non-productive areas and elements and to secure that such areas will be eligible for support under eco schemes for biodiversity building on top of GAEC 8. If such areas are to be fenced off from the animals to count as GAEC 8 and in eco schemes, this will decrease animal welfare and it will decrease the contribution of such habitats to biodiversity.

Under the current rules for ecological focus areas (EFA) buffer strips and field margins can be grazed. Therefore, we see an allowance of the presence of grazing animals as a natural prolongation of the principles of the EFA-rules. A ban on the presence of animals on non-productive elements would be completely counterproductive to the biodiversity objective of GAEC 8.

Therefore, it is essential that the presence of animals in biotopes that fulfill GAEC 8 as well as non-productive features in a supplemental eco-scheme for biodiversity is allowed.

**Delete requirement of setting a maximum size of additional landscape features**

In the draft delegated regulation on the content of the CAP strategic plan, there is a requirement to set a maximum size of landscape features which are not protected under GAEC. This requirement is – seen from our perspective –completely unnecessary red tape which will in practice prevent the farmers from having additional landscape features on their farm for the benefit of biodiversity. The only requirement needed here is to ensure, that such landscape features are not predominant and, that they do not significantly hamper the performance of the agricultural activity. This can easily be done without setting a maximum size of the specific feature, if the member state sets a maximum share of the field that ensures, that the feature is not predominant.

**Ensure simple rules that can reward biodiversity**

Lastly it is extremely important that the European Commission allows Member States to ensure a simple implementation of elements that can count as non-productive areas under GAEC 8. It is also very important that new elements placed in connection with existing hedges and biotopes can be rewarded with higher support and/or conversion factors, as this will be very beneficial for biodiversity.

We hope very much that the European Commission will help to ensure that these suggestions will be considered, as they will have large influence on the CAP contribution to biodiversity and also make life easier for farmers.

**Best regards**

*Chairman Arne Henriksen*  
**Danish Beekeepers Association**

*Director Britta Riis*  
**Animal Protection Denmark**

*Chairman Claus Lind Christensen*  
**Danish Hunters' Association**

*Board member Flemming Torp*  
**Danish Outdoor Council**

*Director Lars Midtby*  
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*Chairman Egon Østergaard*  
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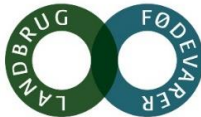
*Chairman for the Organic Sector Hans Erik Jørgensen*  
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**DYRENES  
BESKYTTELSE**



*The senders of this letter consist of a broad group of Danish organizations who represent a wide range of interests concerning the protection, recreational and agricultural use and management of nature, biodiversity, and agricultural land.*