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Opinion Piece

Are European farmers and forest owners really at the heart of the Biodiversity Strategy 2030?

The European Commission is working on the Strategy that will outline the EU's position on the global negotiations and put forward EU commitments to address the causes of biodiversity loss by 2030. However, the approach currently under consideration is a justified cause for concern for all European farmers, forest owners and their cooperatives. This is because **the current draft of the Strategy fails to build on some of its main premises:**

“This strategy proposes a more holistic approach to biodiversity policy. It is enterprising in spirit and in action. Protecting and restoring nature cannot solely be imposed by regulation. Farmers, fishers, foresters, landowners and users are at the heart of this strategy: they are key actors in protecting biodiversity, while directly benefiting from it.”

Reading the recently reported version of the draft proposal, we have noticed that this holistic approach is applied only to the extent that the Strategy tries to tackle as many elements related to biodiversity as possible, but the reflection on the socio-economic consequences of different targets is clearly missing from the current draft. As things stand currently, the Biodiversity Strategy will propose a set of targets and will consider impact assessments only as a second step. For farmers, this is putting the cart before the horse. Despite this approach, the Commission will have sooner or later to address a major question: ***What will be the cumulative socio-economic impact of the following targets (including impact on food prices) in Europe?***

- **10% of utilized agricultural areas under non-productive elements** - Beyond the loss in yields and income for farmers, it is likely that such a target would reduce the ability of farmers to react to the market or shortages caused by adverse climate conditions and increasing global demand (one of the main reasons why mandatory set-aside for arable land was abolished in 2008). The Commission should instead focus on win-win solutions that incentivise and promote the adoption of measures that are

productive and at the same time contribute to the biodiversity¹, while keeping set-aside management voluntary. The Commission should also commit to developing schemes that will allow farmers to be rewarded by the market for the ecosystem services they provide.

- **At least 25% of the EU's agricultural land should be under organic farming**
 - As farmers, we remain driven by demand and respond accordingly to market requests, but we doubt that the proposed figure seems realistic, being almost four times today's figure of 7%. The draft Strategy fails to address the fact that organic production typically has yields which are 25% lower than conventional yields according to global averages². The gap is particularly large for wheat, with a yield ranging between 40% (Germany) and 85% (Italy) of conventional yields³. In addition, what needs to be taken into account is the number of farmers⁴ that decide annually to switch back from organic production due to the production constraints, related costs, the lack of local demand and the bureaucracy and cost of certification. Farmers would only engage in the complex process of conversion to organic farming provided that they have long term benefits that would come from the market. The balance between the offer and the demand is essential to maintain the economic viability of organic farmers by not reducing farm-gate prices.
- **Significant reductions in the use of plant protection products (PPPs) and fertilizers** - The 2018 STOA report⁵ has clearly indicated that without PPPs, yields will be significantly reduced. Depending on the crop, reductions of between 19% (wheat) and 42% (potato) have been reported. These reductions are higher in regions with high actual production, the latter also as a result of the input of fertilizers, high-yielding varieties, irrigation, etc. Without PPPs, including bio-pesticides, and fertilizers the food security of 11 billion people and the economic viability of our farms are threatened. The draft Strategy doesn't address these potential consequences nor does it mention that farmers would in this case need access to an adequate toolbox of safe, effective and affordable alternatives, as well as access to the latest knowledge, technology and the best advisory services. Rather than theoretical targets, we need to work on concrete solutions.

1 All types of Ecological Focus Areas.

2 Source: <https://doi.org/10.1111/1365-2664.12035>

3 Source: https://ec.europa.eu/info/sites/info/files/food-farming-fisheries/farming/documents/market-brief-organic-farming-in-the-eu_mar2019_en.pdf

4 Partial data reports on average 4 500 agricultural producers quitting organic production annually over the 2013-2017 period, compared to an average of 5 400 newly registered producers. Source: Idem.

5 Source: [https://www.europarl.europa.eu/stoa/en/document/EPRS_IDA\(2019\)634416](https://www.europarl.europa.eu/stoa/en/document/EPRS_IDA(2019)634416)

The current draft under consideration **is not enterprising enough**. In it, the Commission heavily relies on tourism and recreation as the main sources of new jobs and growth for rural areas—two sectors that have been very much struggling due to the current COVID-19 pandemic. In addition, when indicating economic benefits of protected areas, which are largely related to tourism and recreation, the Commission fails to mention that economic benefits generated by these sectors could also have a negative impact on biodiversity and ecosystems. Activities such as construction and transport, as well as tourism’s massive carbon footprint, can equally displace animals, disrupt ecosystems, and reduce biodiversity. None of these aspects are covered in the economic valuation used by the Commission and, according to the same source, should definitely be part of any full cost-benefit assessment of the network of protected areas⁶.

Although stating the opposite, the current draft Strategy is also setting the scene for **more, not less, regulation**, as it calls for strict protection of forests, binding targets, new EU legal framework for the restoration of ecosystems, imposing the timeframe for the implementation of Nature Directives, putting OECMs⁷ under legal protection, announcing changes to the Renewable Energy Directive, influencing access to justice in national courts, etc. **At the same time, it removes very much needed flexibility from the Member States**, with plans to provide a lot of strict guidelines and criteria. This approach will only further limit the extent to which economic, social and cultural requirements and regional and local characteristics can be taken into account in the futures. What is even more worrying is that most of the above-mentioned actions are aimed at activities related to agriculture and forestry. While other businesses, sectors and urban areas will only be encouraged to act voluntarily and participate in different platforms and partnerships, which might result in Europe failing to tackle some of the indirect causes of biodiversity loss.

Even when it comes to the financing of ambitious goals, the Commission seems to be distributing resources with budgetary optics in mind – the art of making limited amount of public money appear to go a very long way - with unclear ways how to actually mobilize private funds to finance ambitious biodiversity goals. Agriculture sector needs more investments taking into account consumer expectations and sustainability objectives.

The Commission should not forget that farming is unlike other businesses, because it must work within the constraints imposed by nature. This means that adverse weather or changes in climatic conditions can have a vast impact on biodiversity and availability of supply, and that farmers only have a limited amount of control over how much is grown in any given year. Furthermore, as agricultural products take time to grow, the response to increased or decreased demand can take a number of years. It is therefore impossible for farmers to behave like the

⁶ Source: https://www.miteco.gob.es/es/biodiversidad/publicaciones/tourism_and_n2000_tcm30-196987.pdf

⁷ Other area-based effective conservation measures by the CBD decision CBD/COP/DEC/14/8 don't have to be legally protected.

⁸ Requirement of the Article 2.3 of the Habitats Directive.

owners of businesses in sectors such as manufacturing and means they are far more exposed to dramatic changes in the market.

We can only hope that the Commission will realise that the strength of the European agriculture and forestry actually lies in its diversity and that all farmers and forest owners should be at the heart of the Strategy⁹. The final goal of the Strategy should not be less agriculture or biomass availability, but rather more sustainable agriculture and forestry in the EU. Facing the effects of the COVID-19 crisis, we cannot risk further reallocation of our agriculture overseas both from environmental and food security points of view. Therefore, the Commission should not expect that European farmers, forest owners and their cooperatives will support a strategy that undermines the viability of the sectors by decreasing their productivity and capacity to invest including in more environmentally friendly tools, further restricting the ways in which they use their land, subjecting them to additional taxation, and making them the target of negative, stigmatising campaigns.

The good news is that Commission still has time¹⁰ to improve this draft proposal and address, in addition to many others, the above-mentioned shortcomings. European farmers, forest and landowners will react accordingly and will support concrete, pragmatic measures that will value real solutions over unrealistic targets.

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⁹ Research has shown that to raise acceptance for more Protected Area designations among affected stakeholders, positive incentives and bottom-up participatory designation processes could help. Source: <https://doi.org/10.1111/cobi.13479>

¹⁰ Especially because international negotiations and the 15th meeting of the Conference of the Parties (COP 15) to the Convention on Biological Diversity (CBD) are being postponed.