

Grasslands in the new CAP: bad news for biodiversity and climate

BirdLife Europe and European Environmental Bureau policy briefing

Key messages:

- » Protection and sustainable management of grasslands is critical for both the protection of biodiversity and climate. Grasslands are under serious threat, mostly from intensification, but also from abandonment and conversion to other uses.
- » New CAP conditionality leaves large areas of grasslands unprotected, including the most valuable ones. Even if protected, most grasslands are poorly managed. Management schemes that have potential to support sustainable management and protect biodiversity are underfunded, while most funds still support intensification. Measures that would encourage reduction of livestock are missing.
- » CAP subsidies should be retargeted towards supporting extensive farming systems that take into account ecological requirements of habitats and species. Farmers should be offered specific schemes that support them in the transition towards extensive systems. That would need to be flanked by other policies targeting dietary shifts and waste reduction. No subsidies should go to intensification.

1. Introduction

Permanent grasslands cover up to 34% of the EU's agricultural area.¹ In Europe, species-rich and structurally diverse grasslands are key for preserving biodiversity.² When adequately managed, grasslands can be major carbon sinks. Furthermore, they provide many other ecosystem services such as water purification, erosion and flood control and are also important from a cultural perspective. As such, preventing their conversion and ensuring sustainable management is critical.

Despite their importance, most grasslands are under threat. They are over-used as a result of high livestock densities, are over fertilised and face further intensification and conversion to other land uses. Moreover, grasslands also face abandonment when economically unviable. Both intensification and abandonment have negative impacts on pollinators, farmland birds and semi-natural habitats. According to the European Environment Agency's (EEA) State of Nature report of 2020, grasslands are among the habitats with the highest share of assessments showing a bad conservation status (49 %).³

The preservation and restoration of (semi) natural elements and extensive grasslands is, according to experts, one of the key priorities that will determine to what extent the new Common Agricultural Policy (CAP) green architecture will tackle the biodiversity crisis.⁴ The new CAP green architecture, built of enhanced conditionality, eco-schemes and second pillar interventions, has been designed to ensure higher environmental and climate ambition of CAP. Together with national agricultural experts, BirdLife Europe and the European Environmental Bureau (EEB) analysed CAP strategic plans submitted to the European Commission of 11 countries (Austria, France, Italy, Ireland, Germany, Poland, Portugal, Slovenia, Slovakia, Spain, Sweden) to evaluate how Member States plan to use the elements of CAP green architecture to protect and manage grasslands.

2. Inadequate baseline: large areas of biodiverse grasslands at risk of conversion

2.1 Requirements of the CAP law for the protection of grasslands

To receive direct payments, farmers have to comply with conditionality - the baseline of the CAP green architecture. The standards that aim to protect permanent grasslands are Good Agricultural and Environmental Condition (GAEC) 1 and GAEC 9.

1 - [Eurostat, 2020. Share of main land types in utilised agricultural area \(UAA\) by NUTS 2 regions](#)

2 - [Habel, J.C. et al., 2013. European grassland ecosystems: threatened hotspots of biodiversity.](#)

3 - [EEA, 2020. State of Nature in the EU.](#)

4 - [Pe'er et al, 2021. The Common Agricultural Policy post-2020: Views and recommendations from scientists to improve performance for biodiversity. Volume 1 – Synthesis Report](#)

GAEC 1 provides a general safeguard against conversion to other agricultural uses, mainly to preserve the carbon stock. It sets a threshold of 5% ratio for conversion of grasslands compared to reference year 2018, with flexibility for Member states to set national, regional, subregional or holding levels.

GAEC 9 aims to safeguard species and habitats of the Natura 2000 areas protected by EU law. It introduces a ban on converting and ploughing grasslands designated as Environmentally-Sensitive Permanent Grasslands (ESPG) in Natura 2000 sites. It must be noted that the final wording represents a weakening compared to the text proposed by the European Commission which covered all grasslands in Natura 2000 sites and not only ESPGs. It is also weaker than the 2014-2020 CAP greening obligation related to protection of permanent grasslands, which allowed Member states to designate ESPGs also outside of Natura 2000 areas.

Grassland habitats should be also protected through Statutory Management Requirements (SMRs) 3 and 4, which concern Birds⁵ and Habitats Directives⁶. Respective articles listed in SMRs (4.4. in case of Birds Directive, 6.2. in case of Habitats Directive) require Member states to take appropriate steps to avoid pollution or deterioration of habitats and habitats of species protected by the directives.

2.2 Member states' choices for GAEC 1 and GAEC 9 and their implications for the protection of grasslands

2.2.1 GAEC 1 - Maintenance of permanent grassland

As can be seen in Table 1, most countries stuck to the maximum threshold value of 5% of grassland conversion per year set by the EU legislation. Austria and Germany set the threshold value at 4% and Portugal at 4,5%.

All the analysed countries, set the threshold on a national level (see Table 1). Only in Germany, it was set on the regional level. For example, the fact that Austria set the threshold for conversion ratio at the national level is very unfortunate as there are big regional differences amongst the federal states. There are regions with a very low percentage of grassland (Burgenland 6%, Lower Austria 19 %), while in others (Tyrol, Vorarlberg, Salzburg) it is over 90%. While in regions with less than 10% grassland, every hectare is important and should be protected. In regions with predominant grassland, conversion to arable should not be a problem and can bring in some landscape diversity.

Some countries such as Portugal and Italy have a pre-authorisation system in place, which requires an assent of national authorities before a conversion. A pre-authorisation system is mandatory in Germany too, but there are exemptions for

5 - [Directive 2009/147/EC of the European Parliament and of the Council of 30 November 2009 on the conservation of wild birds](#)

6 - [Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora](#)

grasslands created after 2021 and small conversions (500m²). In France, farmers have to ask for the authorisation after the 2% threshold is exceeded. In Austria and Ireland, the authorization requirement kicks in after the maximum threshold of 5% is exceeded.

Italy is the only country that established a safeguard for sensitive areas; Natura 2000 sites cannot be converted. However, there is a risk of losing high value meadows that are outside of Natura2000 and not protected neither by GAEC 1 nor GAEC 9. In Slovenia, a lot of HNV grasslands have been lost since the accession to the EU in 2004, as shown by repeated habitat type mapping. The design of GAEC 1 and its national implementation means that further 5% will be destroyed with EU approval, with most of it likely to be HNV grasslands.

All analysed countries enacted a requirement for a remedy action obliging farmers to restore grasslands, after exceeding the threshold or shortly before that. In Germany, if farmers wish to convert grasslands created before 2015, those need to be compensated elsewhere.

Country	Threshold for max. rate of conversion	Geographical level	Preauthorization?	Safeguards for sensitive areas?
Austria	4%	national	After the ratio exceeds 4%	no
France	5%	national	After the ratio exceeds 2%	no
Ireland	5%	national	After the ratio exceeds 5% ratio	no
Italy	5%	national	Yes	Natura 2000 areas cannot be converted
Germany	4%	regional	Yes, with some exceptions	no
Poland	5%	national	no	no
Portugal	4,5%	national	yes	no
Slovenia	5%	national	no	no
Slovakia	5%	national	no	no
Spain	5%	national	no	no
Sweden	5%	national	no	no

Tab 1: Details on implementation of GAEC 1

2.2.2. GAEC 9 - Protection of valuable grasslands in Natura 2000

The CAP strategic plans regulation does not give much flexibility regarding the implementation of GAEC 9, which results in a uniform implementation across all analysed Member states. What makes a difference, is the proportion of grasslands in Natura 2000 areas that have been designated as ESPG. Some countries, such as Germany, designated all grasslands in Natura 2000 as ESPG. Portugal, however,

designated only a small proportion of grassland in Natura 2000 as ESPG, namely 1%. Similarly, Ireland allocated only 30,134 ha or less than 4% of Natura 2000 grasslands as ESPG although a much larger area is available and mapped. So, in those countries most valuable grasslands, including many Habitats Directive Annex 1 grassland sites, are left unprotected.

The other issue is that many of the ESPG occur outside of Natura 2000 and hence are not adequately protected by conditionality. This is for example the case in Ireland, Poland, Slovenia and Sweden.

Greening rules under CAP 2014-2020 allowed Member states to designate ESPG outside of Natura 2000, but according to the European Court of Auditors (ECA)⁷, only 6 Member states have done this.⁸ It is not clear what will happen to those grasslands, given that greening rules will not apply onwards 2023 as the new GAEC 9 covers only Natura 2000 areas. In their observations on GAEC 9, the European Commission invited some Member states (e.g. Italy, Ireland) to consider a large definition of ESPG, taking into account grassland status and trends. It is especially pertinent in Ireland that it is a predominantly grassland country.

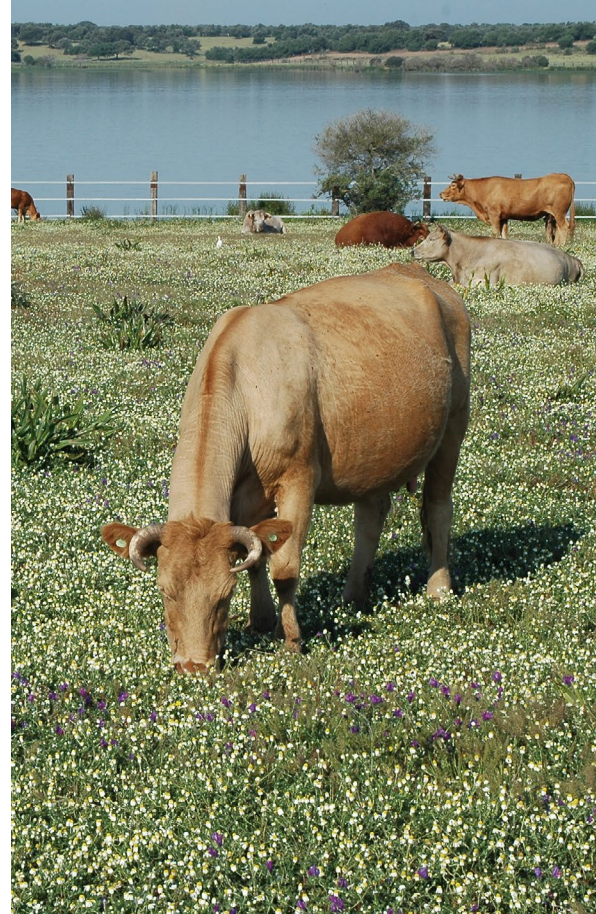


Photo: Pierre Commenville

2.2.3 SMR 3 and SMR 4

SMR 3 (Birds Directive) and SMR 4 (Habitats Directive) are an integral part of the conditionality of all CAP strategic plans. However, as the plans do not include sufficient details on how those standards will be implemented on the ground, it is not clear to what extent they will prevent deterioration of habitats and habitats of species, including grasslands.

Judging from the previous implementation of SMRs, their potential to prevent deterioration of grasslands will remain on paper, unless the European Commission comes with robust guidelines with a view to step up controls and enforcement and Member states implement them. The ECA Special report 13⁹ stated: *“The SMR component of cross-compliance did not provide farmers with an additional obligation to maintain and enhance farmland biodiversity. However, inclusion within cross-compliance does provide a regular inspection regime for these requirements and does make the farmers aware of the conditions to be complied with.”* ECA also found that: *“infringement rates for several requirements and standards were below 1 %. The SMRs concerned related to the conservation of wild birds and natural habitats.”*

7 - [ECA, 2017. Greening: a more complex income support scheme, not yet environmentally effective](#)

8 - Belgium (Flanders), Czech Republic, Italy, Latvia, Luxembourg and the United Kingdom (Wales).

9 - [ECA, 2020. Special Report 13/2020: Biodiversity on farmland: CAP contribution has not halted the decline](#)

3. Good voluntary management measures are underfunded, subsidies support intensification of grasslands

3.1 Voluntary management measures: options offered by the EU law

The CAP strategic plans regulation provides Member States with two key instruments that can support sustainable management of grasslands and/or protection of grassland habitats and species: eco-schemes funded under Pillar 1 (article 31) or agri-environment-climate commitments (article 70) funded under Pillar 2. In addition, non-productive investments can be an important tool for converting arable land to grasslands, grassland restoration or changes in grassland water regime.

3.2 Member states' choices for voluntary measures and their implications

Our earlier assessment based on the draft CAP strategic plans focused on the environmental delivery of eco-schemes, found that eco-schemes for grassland management were amongst the most numerous eco-schemes types.¹⁰ However, only about half of them were considered by national experts as “Good - likely to deliver”. The main criticism was that eco-schemes did not include any limit on livestock density (in regions where it would be environmentally sound to do so), nor the appropriate management requirements to ensure that mowing or

extensive grazing delivers the desired benefits for biodiversity or climate. The submitted plans included some improvements, but the overall picture remains the same.

All analysed Member states put in place eco-schemes and/or AECM for the management of grasslands that have potential to deliver for biodiversity and climate. The problem is that these “good schemes” mostly have very low target areas and/or uncompetitive premia. That makes their potential for delivering on the stated objectives limited. For example, the AECM in Portugal to support sustainable management of Montados, has a target area of 172,000 ha, while Montado occupies more than a million hectares just in the south of Portugal. In Poland the ‘Protection of valuable habitats



Photo: Ariel Brunner

¹⁰ - [BirdLife Europe, EEB, WWF EPO, 2021. Will CAP eco-schemes be worth their name?](#)

and endangered bird species in Natura 2000 sites' is planned for 114,575 ha for birds breeding habitats and 146,784 ha for valuable habitats, whereas the PAFs identifies the need to protect 337,771 ha of bird habitats and 523,540 ha of valuable semi-natural habitats associated with agriculture. This means that only 33% and 28% respectively of valuable habitats will be covered by the necessary management action. In Austria, only about 10-15% of grassland is likely to benefit from effective measures.

In Spain, the premia for schemes for extensive grassland management are the lowest from all the eco-schemes. This might make them unattractive to farmers as they can choose other schemes with higher premia. In Poland, the low premium for the "water retention on permanent grasslands" eco-scheme puts in question the attractiveness of this scheme to farmers.



Photo: Aleksandra Pępkowska-Król

On the contrary, "problematic" schemes that lack limits on livestock density, allow frequent cutting (often close to conventional management), do not limit use of fertiliser and/or do not take into account specific requirements of grassland habitats and species benefit from large budgets, large target areas and attractive premia. Such schemes are likely to lead to intensification of grasslands or maintain them in super-intense conditions leading to further deterioration of their quality and functions.

The report from the RISE foundation analysing safe operating space for livestock in the EU¹¹ concluded that *"the current EU livestock production is associated with greenhouse gas emissions and nutrient flows which are currently far higher than the upper boundaries of the safe operating space and is therefore unsustainable."* Secondly, it concluded that if Greenhouse Gas (GHG) emissions from livestock are to be reduced in line with the internationally agreed targets, it will necessitate a mixture of efficiency gain and for most EU Member states, a reduction in livestock numbers. Hence, it is very worrying that CAP funds are not being used to this end and no effective schemes are in place that would incentivise reduction of production of dairy and livestock and support extensification.

More information on the proposed eco-schemes and AECMs in analysed Member states can be found in Annex 1. In countries with regional structure such as France, Italy, Germany we were not able to comment on the ambition and potential delivery of AECM, due to lack of information on budget and target areas.

11 - [The Rural Investment Support for Europe \(RISE\) Foundation, 2018. What is the Safe Operating Space for EU Livestock?](#)

4. Support for restoration is minimal, investments and coupled support incentivise intensification

Only a few Member states allocate investments supporting restoration of grasslands. Italy, under non-productive investment, will support restoring grasslands and degraded or re-created peat bogs, as well as protecting them from trampling or livestock access. Spain will support restoration of grasslands with high potential of Carbon Dioxide (CO₂) fixation under non-productive investments. Portugal will support installation, regeneration or renewal of extensive agroforestry systems. In regional countries, such as Italy, the budgets for second pillar interventions are not clear, in other cases they are not adequate to what would be needed.

However, across the board massive investments are dedicated to measures that are likely to increase and intensify production (stables, machines) without robust environmental safeguards. For example, in Spain the investments represent 42,8% of the CAP Strategic Plan budget. In Portugal, the support for irrigation projects, either direct or under productive investments, are expected to result in the conversion of agroforestry systems with grasslands into irrigated monocrops.

In addition to investments supporting intensification, voluntary coupled support is another type of subsidy giving a wrong signal to farmers to intensify even if the demand is not there. During the previous CAP, the vast majority of coupled support went to the meat and dairy sectors¹² and it is likely to be the same for the new CAP. There is indication that most of the voluntary coupled support for livestock, which in Poland for example is as high as 1,710,922,147 Euro, goes to intensive farms and does not support extensive systems that strengthen a range of ecosystem services.

In some countries, for example Sweden, the support for Areas for Natural Constraints is linked with livestock numbers, which can lead to intensification or pastures.



Photo: Tatiana Nemcova

12 - [EC, Voluntary coupled support](#)

5. Conclusions and Recommendations

Sustainable managed grasslands are a critical piece of the puzzle in the EU's efforts to tackle biodiversity and climate crisis. Considering the alarming conservation status of grassland habitats and the need to reduce ruminant livestock's contribution to climate change, it is necessary to *increase support for low-intensity grassland management to optimise the provision of essential ecosystem services from Europe's permanent grasslands* (Schils et al, 2022).¹³

Our analysis shows that the new generation of CAP strategic plans is a huge missed opportunity in this regard. Not only do CSPs fail to adequately protect valuable grasslands from conversion to other uses and to adequately support sustainable low-intensity management, but most of the funds go to problematic management schemes that lack safeguarding against intensifications, investments and voluntary coupled support likely to lead to further intensification. There are no effective incentives that would lead to the reduction of livestock numbers.

The following points are required to ensure protection and sustainable management of grasslands:

- 1. EFFECTIVE BASELINE PREVENTING CONVERSION OF GRASSLANDS:** GAEC 1 should be set on a regional or lower level and a pre-authorisation system for any conversion should be put in place. There should be safeguards for Natura 2000 or other protected areas. GAEC 9 should be defined in a way that covers all grasslands in Natura 2000 areas and ESPG outside Natura 2000.
- 2. BETTER ENFORCEMENT, NO SUBSIDIES TO THOSE WHO BREAK EU LAW:** The European Commission should prepare a guidance for Member states on implementation of SMR 3 and SMR 4 aiming to enhance controls and enforcement and Member states should implement it.
- 3. STEP UP INVESTMENT IN MEASURES THAT DELIVER FOR BIODIVERSITY AND CLIMATE:** Budgets and target areas for management schemes that support extensive management of grasslands in line with ecological requirements of species and habitats should be increased to reflect the needs (set in national and regional planning documents if relevant) and the premia should be made attractive to farmers while taking into account the environmental delivery.
- 4. END TO PERVERSE INCENTIVES, SUPPORT JUST TRANSITION:** Any support that is likely to lead to intensification of grasslands or higher livestock numbers should not be included in CSPs. Instead, specific schemes should be introduced to support just transition towards extensive systems ensuring sustainable management of grasslands and preventing abandonment. That would need to be flanked by other policies targeting dietary shifts and waste reduction in order to ensure that reduced livestock numbers is matched by reduced consumption of livestock products.

13 - Schils R. et al, 2022. [Permanent grasslands in Europe: Land use change and intensification decrease their multifunctionality.](#)

GLOSSARY:

AEEM: agri-environment-climate measure/commitment (article 70 of CAP strategic plans regulation)

CAP: Common Agricultural Policy

CSP: CAP Strategic Plan

GAEC standards: good agricultural and environmental conditions of land, part of CAP conditionality

HNV grasslands: high natural value grasslands

ESPG: environmentally sensitive grasslands

LSU: Livestock unit

PAF: Prioritised Action Framework for Natura 2000

RDP: Rural Development Programme

SMR: statutory management requirements, part of CAP conditionality

ANNEX

Table 1 summarises grassland related schemes that are considered by experts as potentially having a positive impact for biodiversity and/or climate.

Table 2 lists grassland related schemes that are potentially problematic and should be significantly improved or not included at all.

1. Overview of voluntary measures (eco-schemes, AEEM) with potentially POSITIVE impact on biodiversity and/or from a climate perspective

Country	Name	Target Area/Budget/ Premium	Comment
Austria	AEEM: Basic intervention "UBB" BioDiv grasslands	Target area: 127,000 ha, about 6% of grassland; Budget: 535,000,000 € total for "UBB" not clear how much for BioDiv grasslands	Late mown areas, but also flowering strips etc. included.
	AEEM: Bergmähder/mountain meadows	Target area: 2,000 ha, 0,2% of grasslands Budget: 5,700,000 €	Helps maintain mountain meadows; however, only a small fraction of all grassland is affected.
	AEEM: top-up "species rich meadows" within AECC "humus preservation and soil protection on ploughable grassland"	Target area: 300,000 ha, 27% of grasslands for total AECC "humus preservation", but no information about the extent of the top-up "species rich meadows" (certainly only a fraction) Budget: 1,500,000 €	Meadows containing indicator species for extensive management can profit from this top-up. Since; this needs to be part of the measure "humus-preservation" no large area-impact is expected.

	AECM: conservation measure (mainly grassland)	Target area: 80;000 ha, 7% of grassland Budget: 240,000,000 €	
Ireland	AECM: Tier 1 Priority Environmental Asset. Private Natura- Low input permanent grassland (Results based) AECM: Tier 2 General-Sustainable grazed pasture (MSL) (results based) AECM: Tier 2 General-Management of intensive grassland next to a watercourse -This action incentivises extensive management of fields next to a watercourse.	Target area: 829,050 ha Budget (total): 1 billion €	Tier 1: Results based scorecard will be used. Unclear what advice farmers will receive. Tier 2: Targeted at intensive farmers to reseed with multi-species sward rather than perennial ryegrass monocrop. Unclear benefits for biodiversity. Tier 3: Management will need to be carefully monitored. Unclear benefits for biodiversity. Claims that it will be good for birds but unproven.
	AECM: Tier 3 Cooperation Measure	Target area: 779,120 ha Budget (total): 550,000,000 €	8 Geographic Cooperation Areas led by a multi disciplinary Local Cooperation Project Team including ecologists. It will include the Burren Farming for Conservation area, Hen Harrier areas and Fresh Water Pearl Mussel area. This measure will use a hybrid results based/costs incurred/income forgone approach to a wider geographical area. Semi-natural grasslands amongst other habitat types will be sorted. A very promising scheme using experience gained from the results-based approaches of the European Innovation Partnerships under current CAP. Participants will also have access to Non-Productive Investment funds.
Italy	AECM: Management of Natura 2000 habitat (ACA9)	For Pillar II interventions, the percentage of dedicated budgets and areas are not yet clear, as these details will be decided at regional level.	This intervention allows the payment of the practices foreseen by the Priority Action Framework (PAF). Many sites have interventions aimed at maintaining the biodiversity of pastures. If applied correctly at regional level, this intervention could contribute to the maintenance of grasslands in the Natura2000 network.
	AECM: Permanent grassland management (ACA8)	For Pillar II interventions, the percentage of dedicated budgets and areas are not yet clear, as these details will be decided at regional level.	The intervention is designed to prevent abandonment of grasslands. It should be implemented with useful management prescriptions for the conservation of biodiversity (especially flora and birds). NGOs have asked for these specifications to be included both at the national level and in the individual regions that will implement the intervention in the Rural Development Programme (RDP).
Germany	Eco-Scheme for non-productive areas in grassland	Target area:205,000 ha Premium: 900-300€/ha	
	Eco-Scheme for grassland extensification	Target area: 1,980,000 ha, Budget:227,479,352 € per year Premium: 115€/ha	

	Eco-Scheme for indicator species (4 species)	Target area: 640,000 ha, Budget: 153,745,143 € per year Premium 240€/ha	
	AECM: There are several good AECM addressing grassland		Implemented at the level of states.
Poland	Eco-scheme: Extensive use of permanent grasslands with livestock	Target area: 582,000 ha Budget (total): 535,870,680 EUR Premium: 188.31 EUR/ha	The grassland animals density on the holding shall be at least 0,3 LU/ha permanent grassland and maximum 2 LU/ha permanent grassland during the growing season
	Eco-scheme: Water retention on permanent grassland	Target area; 360,000 ha Budget (total): 111,157,200 EUR Premium: 63.15 EUR/ha	In order to receive payments in a given year, flooding must have occurred on permanent grassland between 1 May and 30 September for a period of at least 12 days. Meant only for grasslands in which the agri-environment-climate scheme is implemented. There is a big question mark about implementation of this scheme, as its premium is according to NGOs very low and uncompetitive.
	AECM: 1. Protection of valuable habitats and endangered bird species in Natura 2000 sites; 2. Protection of valuable habitats and endangered bird species outside Natura 2000 sites. 3. Extensive use of meadows and pastures in Natura 2000 sites	<u>Intervention 1</u> (in Natura 2000 sites): Target area:114,575 ha for birds breeding habitats 146,784 ha for valuable habitats Budget (total) 528,119,146.84 EUR <u>Intervention 2</u> (outside Natura 2000 sites): Target area: 96,506 ha for birds breeding habitats 257,836 ha for valuable habitats Budget (total) 713,152,078.74 EUR <u>Intervention 3:</u> Target area: 30,944 ha Budget (total) 39,826,625 EUR	Intervention 1 and 2 have several variants: • Protection of Molinia meadows (habitat 6410); • Protection of alluvial meadows of river valleys of the <i>Cnidion dubii</i> (6440) and salt meadows (1340*, 1330); • Protection of dry grasslands; • Protection of semi-natural wet meadows (Calthion); • Protection of lowland and mountain hay meadows (6510, 6520); • Protection of peatlands (e.g. habitat 7230); • Protection of breeding habitats of rare waders – Black-tailed Godwit <i>Limosa limosa</i>, Common Snipe <i>Gallinago gallinago</i>, Redshank <i>Tringa totanus</i>, Lapwing <i>Vanellus vanellus</i>; • Protection of breeding habitats of Great Snipe <i>Gallinago media</i> and Curlew <i>Numenius arquata</i>; • Protection of breeding habitats of Aquatic Warbler <i>Acrocephalus paludicola</i>; • Protection of Corncrake <i>Crex crex</i> breeding habitats.
Portugal	Eco-scheme: Management of Permanent Pastures (A.3.3.1)	Target area: 290,000 ha, just 13% of total area of permanent pastures Budget: 63,000,000 EUR (7% of funds for Eco-schemes)	
	Eco-scheme: Organic farming	Premium: 102 - 97 €/ha for permanent pastures for conversion-maintenance 390 M€ are planned for conversion and maintenance to/under Organic Farming, about 45% of total Eco-scheme funding	This scheme is likely to deliver mixed results. An estimated 60% of organic farming support goes to permanent grasslands and pastures (2019).

	AECM: Biodiverse Pastures	Target area:70,000 ha, Budget (total) 10,500,000 € (about 1% of total AECC budget)	• Soil analysis (unspecified which and the period) • At least 6 different species or varieties in the pasture, with at least 25% of leguminous plants.
	AECM: Montados e Lameiros	Target area: 172,000 ha Budget (total) 24,800,000 €, (Montado occupies more than a million hectares just in the south of Portugal.)	• Limit livestock density • Improve pastures • No soil tillage • No separation of the support for lameiros (wetland) and montado (oak with grassland system)
Slovakia	Eco-schemes: Whole-farm eco-scheme, grassland element	Overall budget for the eco-scheme 513,000,000 EUR, not clear how much will be spent on grasslands Premium outside protected areas: 59 EUR/ha (including arable element) Premium inside protected areas: 92 EUR/ha (including arable element)	• Obligation of delayed mowing (two dates depending on altitude) • Alternative to delayed mowing – grazing (0,3 LSU/ha)
	AECM: Protection of souslik	Premium: 125€/ha	Prescriptions for grazing and mowing. No fertilisers, no pesticides.
	AECM: Management of grasslands habitats in SCAs	Premium: 62€/ha	Prescriptions for mowing dates aiming for mosaic.
	AECM: Management of semi-natural and natural grassland habitats	Premium: From 87€/ha to 202€/ha depending on the type of grassland	Specific management prescription for 7 types of habitats.
	AECM: Conversion of arable to grassland	Premium: 299 €/ha	Minimum area of conversion 5ha, guidance on the seed mixture and ratios (grass, clover, flowering plants). No fertilisers, no pesticides, delayed mowing for 20% of area.
Slovenia	Eco-scheme: Extensively managed grasslands	Target area: 90,000 ha Premium: 30 EUR/ha	It will be carried out on ALL grasslands of an individual farm, minimum grazing density should be 0,2 LSU/ha (soundgrazed grasslands are not allowed that, which can be problematic for certain grassland types, e.g. wet ones).
	AECM: STE	Target area:30-45 ha, Premium: 400-450 EUR/ha	First cut after 1st of August, only 40-60% of plot surface can be cut each year. No grazing allowed. Aimed at protecting the butterfly <i>Coenonympha oedippus</i> and partly also the Corncrake.
	AECM: Wet grassland habitats	Target area: 400-500 ha, Premium: 400-450 EUR/ha	First cut after 30 June, no grazing allowed, no fertilisers, leaving uncut strips if plot larger than 0,3 ha.
	AECM: Conservation of wetlands and bogs	Target area: 200 ha Premium: 400 EUR/ha	Obligatory cut of 2-times in 5 years (so not every year), no grazing, no fertilisers.
	AECM: Dry karstic meadows and pastures	Target area: 1,200 ha Premium: 300 EUR/ha	Detailed instructions for grassland management, including dates of grazing/cutting.

Spain	Eco-schemes: Extensive grazing for increased carbon sequestration Eco-scheme: Uncut margins in meadows or sustainable mowing to maintain and improve biodiversity	Target area: 6,379,901.43 ha; susceptible to grazing: 5,183,609 ha. Target area: 6,379,901.43 ha; susceptible to mowing: 1,196,292 ha. Budget: Wet pastures: 103,168,071 € premium: 62.16 €/ha Mediterranean pastures: 115,305,912 € Premium: 41.09 €/ha	The eco-scheme supporting uncut margins in meadows does not solve abandonment and intensification of meadows. Premium compared to other land types: Cropland (humid rainfed): 90,22 €/ha Cropland (rainfed): 52,35 €/ha Cropland (irrigated): 156,78 €/ha Woody crops (slope < 5%): 71,63 €/ha Woody crops (slope 5 – 10%): 124,59 €/ha Woody crops (slope > 10%): 175,86 €/ha
	AECM: Promotion and management of pastures	Budget 77,383,457 € = 7.3% of AECC (these are 21.8 of CSP budget)	Nevertheless, possibility of using herbicides and phytosanitary products, commercial crops, mechanical clearing of the perimeter margins of the pastures. Other improvements needed: • Prioritise the intervention to the mowing meadows corresponding to Habitats of Community Interest 6510 and 6520 against commercial pastures. • Effective support for extensive, rotational grazing, in the total grazed area (including forest area, cattle trails, fallow land, stubble and vegetable covers), prioritising sheep and goats and complementing the aid to native breeds. • Establish minimum and maximum livestock intensities (for large types of pasture and livestock). • Additional measures for areas of coexistence with large predators.
	AECM: Maintenance or improvement of habitats and traditional agricultural activities that preserve biodiversity	Budget: 42,229,001 € = 4.0% of AECC (these are 21.8% of CSP budget)	It should reinforce the practices of the eco-schemes of elements of the landscape and non-productive prioritising Natura 2000 and important areas of priority species, which has to be in line with the National Strategy for the Conservation of agro-steppe birds, and the PAF.
Sweden	AECM: Management of pastures and meadows	Target area: 2,114,300ha Total budget: 64,000,000 EUR Different level of premia depending on grassland type	Higher target area and budget than in the previous period, but not high enough.

2. Overview of voluntary measures (eco-schemes, AECM) considered as PROBLEMATIC from biodiversity and/or climate perspective

Country	Name	Area/Budget	Comment
Austria	Eco-scheme: 31-04 - Tierwohl - Weide: aimed to decrease ammonia emissions (manure) through grazing during at least 4 months	590.000 ha = 22% of UAA or 49% of permanent grassland; Budget: 171.499.220 €	- It risks intensifying grasslands in areas with high LSU and no alpine pastures no regulation on stocking density is likely to lead to intensive grazing of lowland pastures throughout most of the vegetation period and (breeding) season, deteriorating breeding habitat for birds and other species - This is reinforced through payment per Livestock unit (LSU) - Mash or other additional foodstuff allowed (wording from the CSP: "feeding demand should be mainly covered by grazing.")
	AECM: Heuwirtschaft/haying	114,000 ha, ca. 10% of grassland Budget: 80,000,000 €	Early cutting (mainly for milk production) just the same or earlier as with conventional methods. No regulations concerning use of grass conditioner, which is probably one of the most important drivers of (insect) biomass loss (regardless of whether silage or haying)
	AECM: Mountain pastures	225,000 ha, normally not included in numbers of "permanent grassland" Budget 55,000,000 €	Could be good in principle, but lacks useful obligations on LSU, feeding
	AECM shepherding	Paid per LSU Budget 80,000,000 €	Could be good in principle, but lacks useful obligations on LSU feeding
France	Eco-scheme: Maintenance of permanent grasslands	Target area for grasslands: 7,000,000 ha	Requirement to maintain a ratio of non-tilled permanent grassland (from 5 years) at the farm level, up to 80% (equivalent to 5 years) for access to the eco-scheme and 90% (10-year equivalent) to access its next level. NGO are critical of this approach and suggest replacing the criterion of this eco-scheme with a minimum percentage of grass in the forage area, including a minimum percentage of permanent grassland.
Ireland	Eco-scheme: Agriculture Practice- Extensive Livestock Production (Low Stocking rate)- To promote traditional grassland farming practices at extensive animal stocking rates.	One of 8 Agriculture practices in €1.4 bn ecoscheme	An overall maximum stocking rate of 1.5 livestock units per hectare per annum. Targeted at all farmers. Stocking rate is high and should instead be appropriate to habitat type. The Commission has queried the Irish eco-scheme saying that it provides only modest environmental benefit and that it will be automatically achieved by some farmers and might not provide enough incentive for others to join. Ireland has been asked to provide details on how many farmers are already at 1.5 LU.

Italy	Eco-scheme: Antimicrobial reduction (ES-1)	Budget: is related to other animal welfare actions (support for grazing), covers about 50% of the total budget dedicated to eco-schemes, amounting to euro 4,093,500	An intervention for livestock farming allows grazing, but without establishing any rules on stocking density per hectare or protection of grassland.
	AECM: Management of meadows and permanent pastures	For Pillar II interventions, the percentage of dedicated budgets and areas are not yet clear, as these details will be decided at regional level.	In principle, this intervention is certainly useful to maintain areas that are in danger of being abandoned and therefore lost. However, requirements that would take into account conservation needs of birds and insects are missing. Some improved elements could be introduced by the regions in the RDPs.
Poland	Eco-scheme: Animal welfare	Budget (total): 644,356,236.25 EUR Subsidy per LSU: varies according to the species from 20-300 Euro/LSU	The scheme raises concerns as the level of the subsidy favours on-farm animal husbandry (133.71 euro/LSU). There is far less support for grazing livestock (41.57 euro/LSU).
Slovenia	Eco-scheme: Traditional use of grasslands	Target area: 65,000 ha Premium: 30 EUR/ha	Subsidies will be given to up to three times cut meadows with no restrictions regarding the use of fertilisers or first possible cutting dates. Such frequent use prevents the setting of seeds, thus impoverishing the in situ seed bank and ultimately decreasing the quality of the meadow
	AECM: Extensive grasslands (HAB)	Target area: 5000-5700 ha Premium: 350-400 EUR/ha	Allows too early cutting dates (as early as 20 May in some areas). Such early cuts prevent typical plant species from setting seed – in the long term, this impoverishes grasslands and leads to their degradation. This measure also allows fertilising with up to 40 kg N/ha/year, which is too much for certain Natura 2000 habitat types (e.g. 6210 (*), 6230); ideally, it should be a two- or even three-level measure, paying the highest subsidies to completely unfertilized grasslands and the lowest subsidies to grasslands that are fertilised with up to 40 kg N/ha/year. HAB can also be enrolled on the outskirt areas of intermittent lakes (Natura 2000 habitat type 3180*) and on wet grassland types (including Caricetum stands, <i>Molinia</i> stands etc.), where first cut should not be before Aug or even later (or even once every 2 years).

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