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To Mr. Mario MILOUCHEV
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To Kristina KAMSIUKAITE
DG AGRI unit A.3 European Commission
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NGO POSITION ON PROPOSED MODIFICATIONS FOR LITHUANIAN AGRICULTURE AND RURAL DEVELOPMENT 2023-2027 STRATEGIC PLAN

With this letter we would like to express our concerns on initiative to introduce several changes for the Lithuanian Agriculture and Rural Development 2023-2027 strategic plan (further as – SP) which were presented and voted (on September 11) by the Steering Committee under the Ministry of Agriculture. Proposed and accepted changes by the steering committee are further loosening environmental standards of the Lithuanian SP. We think that proposed changes cannot be accepted as official modification as it contradicts to the environmental objectives set for the Lithuanian SP. Practical implementation of the proposed changes would cause significant negative impact deteriorating our environment and agro-ecosystem related biodiversity financed through public money. Therefore, we kindly ask European Commission to decline Lithuania's proposal for such amendments.

More detailed explanations on the points of concerns and our arguments are given below:

1. Changes regarding the specification of the methodology applied to the complex ecological system "Activities in arable land" (T105eko1) within the SP to ensure its effectiveness and efficiency

The modification proposal by the Steering Committee includes complete renouncing the application of effectiveness and efficiency methodology and no longer linking productive and non-productive ecological systems. To our understanding this proposal violates part 8 of article 31 in the REGULATION (EU) 2021/2115, which states that "*Member states <...> shall use a rating or scoring system or any other appropriate methodology to ensure the effectiveness and efficiency of the eco-schemes to deliver on the targets set.*". Practical implementation of the proposed modification would for example mean that farmers will be eligible

to apply no-till technology (which are anyway applied as baseline practice) without further environmental commitment such as introduction and management of landscape elements, strips supporting pollinators, etc. Proposed modification would disintegrate the idea of the ecological systems to provide environmental benefits in arable land, where it is most needed. Therefore, such modification would cause critical negative impact to our environment and we recommend not to accept it.

2. Changes regarding GAEC7 standard "Crop rotation in arable land, except for crops growing under water"

Proposed modification by the Steering Committee includes following changes:

- The declared arable land that must be in crop rotation under GAEC7 standard has been diminished from 65% to 35%.
- For implementing above-mentioned crop rotation rule secondary crops (e.g. winter catch crops, under sown crops and aftercrops) grown not as a main crop can be also treated as a crop rotation element. Secondary crops must be present continuously in the soil for at least 4 weeks.
- The third proposed alteration further loosens the rule to change crops where crop rotation is not applied. It allows to grow same crops three years consecutively instead of initially fixed 2 year period.

We consider that proposed modification in essence would eliminate crop rotation requirement and will cause a significant negative impact to environment and soil quality. Proper crop rotation (applied in 100% of land) is essential to ensure healthy soil, maintain soil organic carbon balance, reduce needs for pesticides use and fertilization. Therefore, we propose to reject the proposed modification.

In addition, we would like to draw your attention on following aspects important to the context of the debate:

1. Ministry of Agriculture argues that the reduction can be done because most of the percentage is already reached due to the popularity of ecological systems "Crop rotation" and "Cover crops" which covered around 50% of all declared arable land. This argument does not seem logical: if already 50% of arable land is in crop rotation, there is no reasoning to lower the ambition to 35%. Also, the mentioned ecological systems are gaining popularity each year, therefore the declared area should only increase next year and potentially reach the current 65% target.
2. Ministry of Agriculture (2019) has released a guidebook called "A CODE OF GOOD AGRICULTURAL PRACTICE TO REDUCE THE NEGATIVE IMPACTS OF AGRICULTURE ON SOIL, WATER, AIR AND CLIMATE" which was prepared by a working group established from the leading agriculture scientists and experts in Lithuania. The chapter on crop rotation explains its elementary rules:
 - a. Long-term cultivation of one plant in the same place is called mono-cropping. Of the field plants that can be grown in Lithuania, corn and tobacco tolerate mono-cropping. Short-term cultivation of one plant in the same place (up to 3 years) is called reseeding. **However, it is always better to rotate crops than to grow them in the same place by reseeding.**
 - b. Agricultural practices that abandon crop rotation pose a threat not only to the soil, but also to the long-term sustainability and productivity of agro-ecosystems.
 - c. A well-planned crop rotation prevents the spread of weeds, plant diseases and pests, therefore decreases the need for pesticides; can maintain the humus balance or even improve soil fertility; plant nutrients and soil humidity are better used; soil erosion decreases; substances released by the degrading plant residues are poisonous to plants of the same species (allelopathy), phytotoxic effect is reduced.
 - d. The period after which crops can return to the same plot is called a phytosanitary break. Most of the crops need at least a two-year break.
3. The possibility of using secondary crops to fulfil the crop rotation cycle is also not acceptable. They are very useful and can be used to enhance the microbiological activity of the soil, cover it with vegetation for wintertime to avoid erosion and washout of nutrients as well as suppress weeds and perform other tasks, but they cannot fully complete the role of a rotation crop.
4. The terminology for secondary crops is also very dangerously formulated: "Secondary crops must be present continuously in the soil for at least 4 weeks.". The 4 weeks period is too short to have any real effect and it cannot be applicable for winter catch crops at all.

The above-mentioned modification of GAEC7 requirement will not only have negative effects on the environment but also to the economy of farm business, since eliminating proper crop rotation in the farming operation will most likely increase the need to use more mineral fertilizers and pesticides.

5. Changes regarding GAEC4 standard " Establishment of buffer strips along water courses".

We strongly disagree with the proposed updates and exemptions proposed for GAEC4. The modified proposal as laid out formulates that: „From 2025 buffer zones are left only near melioration ditches, where the water flow is evident at least 6 months in a year of average water level. - melioration ditches with a length of at least 3 kilometers or a basin area of at least 5 square kilometers, or melioration ditches about which there are hydrological data that in a medium water year, they have water flow for at least 6 months are considered to be such drainage ditches.“

Here are our arguments against the proposed modification:

1. We acknowledge that due to the changing climate some of the smaller drainage ditches become waterless in the dry season of the year (usually summer). However, the leakage of nutrients is most intensive in the cold season (late autumn, winter and early spring) when the vegetation is hibernating and is not able to uptake nutrients. Therefore, buffer zones near drainage channels being dry in summer are playing its role in cold seasons when nutrient leakage is most active. We draw your attention that during the cold season precipitation in Lithuania is higher and the ditches are filled with flowing water. Also, it is argued that such ditches do not qualify as water bodies under the Water Framework Directive (WFD), however we see this as a very narrow-minded and short-sighted understanding to where the pollution starts and how a water body basin works. These ditches are the primary collectors of diffused agricultural pollution, which then are transported to bigger water bodies, which are indeed a matter of the WFD. The pollution must be stopped where it begins, not when it enters the big water bodies, where no measures can handle it anymore and then the goals of the WFD cannot be achieved.
2. The steering committee accepted this modification proposal without any constructive assessment on the area to be affected. We draw your attention that currently there is no official data available determining which drainage ditches are waterless 6 months in a year. Therefore, currently practical implementation of proposed modification would not be possible.
3. There is no control mechanism foreseen to ensure proper implementation of newly proposed modification. Occurrence of water in the targeted ditches depends on the amount of precipitation, which differs every season and even more difficult to predict in the context of climate change.
4. According to the most recent assessment of water bodies 63 percent of rivers and 64 percent of lakes in Lithuania do not meet the criteria of good ecological status and the major reason is diffused pollution from agriculture¹. The proposed update on the rules will furthermore negatively affect the condition of water bodies.
5. GAEC4 in Lithuania also heavily contributes to the goal of preventing the loss of permanent grasslands. Lithuania has already two years in a row violated the 5% rule for the loss of permanent grasslands and the process of reestablishing the grasslands was started. However, due to farmer protests, the Ministry of Agriculture negotiated with issue with the European Commission, which resulted in the recalculation of the reference number and no need for the farmers to restore the grasslands. The recalculation methodology also counted the buffer strips which are targeted by proposed modification. If proposed modification would be accepted, it would mean that part of the permanent grasslands in those buffer strips will be at risk to be converted into arable land.

¹ Nemuno, Lielupės, Ventos ir Dauguvos upių baseinų rajonų priemonių programa. Upių baseinų rajonų esamos būklės analizė:

[https://aaa.lrv.lt/uploads/aaa/documents/files/Nemuno%20Lielupės%20Ventos%20ir%20Dauguvos%20UBR%20priemonių%20programa\(1\).pdf](https://aaa.lrv.lt/uploads/aaa/documents/files/Nemuno%20Lielupės%20Ventos%20ir%20Dauguvos%20UBR%20priemonių%20programa(1).pdf)

We cannot support proposed modification described in this letter as they lack environmental ambition and aspiration to support the Green Deal goals as well as newly approved Nature restoration law. We recognize that such modifications increase risk to result greenwashing effect of the CAP as public money, which supposed to deliver public goods. We kindly ask the Commission to reject these proposed changes of SP described above and stress the importance that CAP instrument is intended to safeguard not only the economic welfare of the farming sector, but predominantly to reduce its impact on our environment and support public goods delivery. We urge you to encourage forward looking direction for farming that respects planetary boundaries, by helping production to adopt agroecological principles and consumption to converge towards healthy, environmentally compatible levels, while recognising the role of civil society and in particular environmental NGOs in the process.

In behalf of following environmental non-governmental organizations:

1. Baltic Environmental Forum Lithuania (www.bef.lt);
2. Environmental Coalition of Lithuania (www.akoalicija.lt)
3. Lithuanian Ornithological Society (<https://birdlife.lt/>)
4. Foundation for Peatland Restoration and Conservation (<https://www.pelkiufondas.lt/>)
5. Circular Economy (<http://www.circulareconomy.lt/>)
6. Lithuanian Consumers Alliance (<https://vartotojualiansas.lt/>)



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