

European Commission
Commissioner Phil Hogan
DG Agriculture and Rural Development
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Dear Mr Hogan

The European Commission's proposal for simplification of the greening requirements strengthens the bond between nature and agriculture

Small features in the landscape; the small, unprotected patches of nature in the form of hedgerows, trees, field margins, ponds and stone walls, are the glue that connects the arable land together in an attractive and varied agricultural landscape.

When unprotected landscape features and field roads lose their original function in our cultivation of the landscape, they risk disappearing altogether. If these landscape features disappear, many plant and animal habitats will disappear with them, along with access to recreational opportunities. We know this development well in Denmark.

As representatives of the users of the multifunctional values of the agricultural landscape, we have a strong interest in ensuring that, to the widest possible extent, the individual farmer has a positive incentive to preserve biotopes, landscape features and farm roads and to take a large number of other wildlife-friendly and bee-friendly initiatives.

Such incentives already exist in the EU Common Agricultural Policy (CAP), and a substantial number of the landscape features listed above can contribute to meeting the CAP requirement to have 5% of a farm's land comprise ecological focus areas (EFAs).

We are monitoring with great interest the Commission's proposals for simplification of the greening requirement regarding landscape features as ecological focus areas. We understand that the Commission has proposed that several of the landscape features be merged and the rules be simplified.

Simpler regulation and financial incentives instead of administrative red tape and reductions in agricultural subsidies will allow us to couple considerations for a diverse and valued culture landscape with the need for space for an evolving agricultural industry *and* the need for landscape features that make the open countryside an attractive place in which to live and spend leisure time.

We therefore back the Commission's proposal to simplify the regulations for EFA landscape features, and we call for additional simplification of the requirements for drafting electronic forms and maps indicating the location of land eligible for subsidies.

If farmers have incentive to use landscape features as EFAs, such landscape features could be incorporated gradually into the electronic maps that indicate the location of land eligible for subsidies by having the farmers themselves register them. This will reduce the administrative burden that the national competent authorities currently experience of having to enter all landscape features in the electronic maps in advance. There is concern that this burden may deter them from implementing EFA features nationally.

Yours sincerely
Søren Møller, chairman

On behalf of the Collective Impact Steering Committee *The open countryside as a double resource*:

Gustav Garth-Grüner, board member, National Association for Sustainable Agriculture
Lars Hvidtfeldt, vice-chairman, Danish Agriculture & Food Council
Per Kølster, chairman of the board, Organic Denmark
Thyge Nygaard, agriculture policy officer, Danish Society for Nature Conservation
Jan Søndergaard, director, Danish Forest Association
Claus Lind Christensen, chairman, Danish Hunters' Association
Lars Rasmussen, head of secretariat, Danish Association of Anglers
Eske Groes, chief consultant, Local Government Denmark
Jan Ejlsted, director, Danish Outdoor Council
Anne Skovbro, director, Realdania
Steffen Brøgger-Jensen, vice-chairman, Danish Ornithological Society - BirdLife Denmark