



**Pasaules  
Dabas  
Fonds**  
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**European Commission, DG AGRI**  
**130, Rue de la Loi**  
**B – 1049 Brussels**  
**Belgium**

**European Commission, DG ENVIRONMENT**  
**5, Avenue de Beaulieu**  
**B-1049 Brussels**  
**Belgium**

Electronic copies to:  
Latvian Ministry of Agriculture  
Latvian Ministry of Environmental Protection and Regional Development  
Nature Conservation Agency

***On environmental measures in Latvian  
Rural Development Programme 2014–2020***

On behalf of *Latvian Fund for Nature, Pasaules Dabas Fonds* (former *WWF Latvia*), *Latvian Ornithological Society* and *Society of Botanists of Latvia* we would like to express our concerns regarding the draft of Latvian Rural Development Programme 2014–2020<sup>1</sup> (RDP) submitted to the European Commission on January 23, 2015.

We are pleased to acknowledge that the *Ministry of Agriculture* (MoA) has paid more attention to measures that could target environmental issues and there are steps taken in the right direction to improve the content of the only measure that is directly targeting biodiversity – “Preservation of biodiversity in grasslands”. At the same time, there are still significant deficiencies that may lead to Latvian RDP not reaching the environmental goals, thus we would like to bring your attention to several issues:

1. We welcome the changes in the budget of the measure “Preservation of biodiversity in grasslands” restoring the financing to this measure to the level it was in the previous programming period and the introduction of the differentiated support rate that is based on the grassland habitat type. The differentiation of the support stipulates that biologically valuable grassland support will be available in 5 classes:
  - a) Biologically valuable grasslands without up to date habitat information – 85 EUR/ha;
  - b) Grassland habitats on fertile soils and bird habitats – 83 EUR/ha;
  - c) Grassland habitats on moderately fertile soils – 155 EUR/ha;

<sup>1</sup> [https://www.zm.gov.lv/public/files/CMS\\_Static\\_Page\\_Doc/00/00/00/51/78/LAP2014-2020\\_projekts.pdf](https://www.zm.gov.lv/public/files/CMS_Static_Page_Doc/00/00/00/51/78/LAP2014-2020_projekts.pdf)

d) Grassland habitats on poor soils – 206 EUR/ha;

e) Grassland habitats outside field blocks – 330 EUR/ha.

In regards to the above, we would like to point out to threats that would seriously undermine reaching the target set for this measure. Although the MoA has begun the inventory of the biologically valuable grasslands, only approximately 7,000 ha of those have been inventoried to date (February 2015) and thus have the habitat type confirmed. In the situation when remaining 47,000 ha of the biologically valuable grasslands have not yet been inventoried to establish the EU habitat type, the reduction of the support rate from 123 EUR/ha (in RDP 2007-2013) to 55 EUR/ha for those biologically valuable grasslands, where there is no information on the habitat type, will result in abandonment or ploughing up of those grasslands. This concern is supported by the research data of *Latvian State Institute of Agrarian Economics*<sup>2</sup> confirming that 63% of the farmers involved in the measure would abandon or plough up the grasslands if there would be no support.

The cut of the support rate is even more severe for the farmers as it may initially seem, as there is a “de facto” increase of the management requirements. In the future farmers will be required to remove the biomass that will result in increase of the management costs. Therefore, we find that under the proposed conditions the target area of 45,000 ha is unrealistic to reach – in the previous period the areas managed under this measure was only around 35,000 ha. We express our deep concern that the proposed low support rates for the class a) would make the measure financially unattractive to the farmers and the funding may be transferred to other measures having no benefit for the biodiversity or even hampering biodiversity targets.

2. The management requirements for the measures “Organic farming”, “Stubble fields in winter period” and “Application of environmentally friendly methods in horticulture” should foresee that in cases when the farm has grasslands classified as biologically valuable, the farmer must manage them according the requirements set out for measure “Preservation of biodiversity in grasslands”. Only introduction of such management requirements would justify these measures as targeting priority area 4A (Restoring, preserving and enhancing biodiversity, including in Natura 2000 areas, and in areas facing natural or other specific constraints, and high nature value farming, as well as the state of European landscapes) and/or avoiding actions that may work against this priority.
3. Measure “Payments to areas facing natural or other specific constraints” (formerly measure “Support for less favoured areas” – LFA) is justified solely by Union rural development priority 4 (Restoring, preserving and enhancing ecosystems related to agriculture and forestry). To our understanding, the measure primarily targets economical and to some extent social issues and the environmental and biodiversity related benefits are far less visible, if touched at all. We would like to point out that abandonment of agricultural lands is only one of the drivers for loss of biodiversity in agricultural lands. At the same time, the intensification of production and expansion of arable lands on the expense of grasslands plays a crucial role in the loss of biodiversity in the agricultural lands. In addition, the RDP 2007-2013 evaluation

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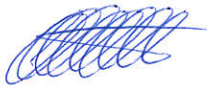
<sup>2</sup> [http://lvaei.lv/images/Nacionalie\\_projekti/LAP\\_2013/Bioloiskas\\_daudzveidibas\\_uzturesana\\_zalajos\\_petijums\\_2013.pdf](http://lvaei.lv/images/Nacionalie_projekti/LAP_2013/Bioloiskas_daudzveidibas_uzturesana_zalajos_petijums_2013.pdf)

report prepared by *Latvian State Institute of Agrarian Economics*<sup>3</sup> identify that the LFA payments should support extensive agriculture and not intensification. The same report notes that the area of agricultural lands applied for payments has increased by 3%, whereas the increase in LFA is only 1.7%. It is concluded that the support has resulted in more efficient and intensified use of land and thus cannot be justified by reaching biodiversity related goals. Thus we would recommend not to apply the minimal animal density threshold for the biologically valuable grasslands that are eligible for the support under measure “Preservation of biodiversity in grasslands” as there are many areas where grazing is not possible and the available support does not cover the costs for mowing and removing of the grass.

4. There are indications that, in response to the planned measure “Natura 2000 support for forests”, significant areas of grasslands, scrublands and mires in protected areas are formally transformed to forests in order to receive the support. To avoid the misuse of the RDP funds, we recommend that only those forests that have reached a certain age (min 20 years) would be eligible to receive the compensation within the measure “Natura 2000 support for forests”.

We strongly believe that the RDP can play an important part in preserving the biodiversity, but in order to do so the above-mentioned considerations must be taken into account.

With kind regards,



Ģirts Strazdiņš

Board of  
*Latvian Fund for  
Nature*



Jānis Rozītis

CEO of  
*Pasaules Dabas Fonds  
(former WWF Latvia)*



Jānis Priednieks

President of  
*Latvian Ornithological  
Society*



Egita Zviedre

Deputy of the Board of  
*Society of Botanists of  
Latvia*

For further enquiries, please contact Mr Andrejs Briedis, phone: +371 26309648, e-mail: [andrejs.briedis@ldf.lv](mailto:andrejs.briedis@ldf.lv)

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<sup>3</sup> [http://lvaei.lv/images/Nacionalie\\_projekti/LAP\\_2013/2.ass%20platbmaksjumu%20ekonomisk%20un%20vides%20analize.pdf](http://lvaei.lv/images/Nacionalie_projekti/LAP_2013/2.ass%20platbmaksjumu%20ekonomisk%20un%20vides%20analize.pdf)