

# 18. Agroforestry and the EU Nature Restoration Regulation

EURAF Policy Briefing No 18 (v1 22.7.22, v2 20.1.23, v3 17.9.24, v4 5.2.25, v5 16.6.25).

Gerry Lawson (EURAF)<sup>1</sup>, Rico Hübner, Anke Hahn (DeFAF), Sonja Kay (AGROSCOPE)

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EURAF is an NGO, based in Montpellier and Brussels (Transparency Register ID of [913270437706-82](https://ec.europa.eu/transparency/transparency-register/913270437706-82)). It aims “to promote the adoption of agroforestry practices across Europe by supporting efforts to develop awareness, education, research, policy making and investments which foster the use of trees on farms”. It has a network of 31 affiliated entities in 23 countries.

**Briefing #18 (v5) adds (p6 onwards) information on the Commission Notice providing “Guidance on a framework for developing methodologies to monitor high-diversity landscape features pursuant to Article 14(7) of the Nature Restoration Regulation”. We conclude that this 20-page note could have been avoided if EURAF’s advice had been followed and the distinction between “productive” and “non productive” trees had been removed from NRR text. There is no such thing as a non-productive tree in agriculture, all trees are potentially productive since they not only give environmental services, but timber, fuelwood, shade, shelter fruits, fodder etc. Given the pressure on European forests to meet carbon removal and bioeconomy needs, and growing the risks from climate change, it must be clear that Trees outside the Forest are a productive resource which must be managed. The “Rural Simplification Omnibus”, promised for Q4 of 2025, should therefore remove all mention of “non-productive” trees from the NRR and make it clear that the woody landscape features measured for NRR compliance are exactly those which must be measured for CAP compliance, and which were previously measured in the EFA layer of the LPIS as part of compliance with the Greening Regulation in the previous CAP.**

Version 4 (5.2.25) focused on the NRR draft [Implementing Regulation](#) and its [Annex](#) (“Uniform Format Nature Restoration Plans”). We recommended that Member States should encourage farmers to code agricultural trees as “woody landscape features” and that reporting of these features should be mandatory. We regretted: a) the NRR index for “high diversity landscape features” remained different from that used in CAP reporting and a single index is needed: b) mandatory indices of forest diversity still include indicators like “standing dead” or “lying dead” biomass, which may undermine the very objectives of the regulation by increasing wildfire; c) ecological classifications and measures should be cross-mapped against agricultural land uses and practices, and that this can be done on a parcel by parcel basis using the CAP Land Parcel Information System (LPIS), including information on forest land and parcel boundaries. An open-source “Rural Land Parcel Information System”, was recommended, based on the existing agricultural LPIS but including forest parcels. This can be consistently used for CAP, NRR, SFI, LULUCF, CRCF and Corporate Sustainability reporting.

*Harvesting acorns to feed swine, from the Queen Mary Psalter, British Library – EURAF welcomes revision of the NRR to confirm that agroforestry, and lines or small-groups of trees, are included as “high-diversity landscape features” – even if they are “productive”*



<sup>1</sup> [policy@euraf.net](mailto:policy@euraf.net)

<sup>2</sup> The [Biodiversity Strategy](#) used the wording “To provide space for wild animals, plants, pollinators and natural pest regulators, there is an urgent need to bring back at least 10% of agricultural area under high-diversity landscape

## 1. Previous versions of Briefing #18

### 1.1 Version 1 (22.7.22)

The initial version of this briefing welcomed publication by the Commission on 22.6.22 of a [proposal](#) for a Nature Restoration Regulation<sup>3</sup> (NRR). It noted that the proposal was designed to restore degraded ecosystems and reverse biodiversity loss in the EU, with legally binding targets and a proposal for expenditure of €100 billion by EU Member States to restore nature and reverse biodiversity loss in agriculture, forests, oceans and urban areas. It noted that the draft regulation had been welcomed by environmental groups like [WWF](#), [IEEP](#), [IUCN](#), [FERN](#), [EEB](#), [Birdlife](#), but received with more caution by producer groups. [COPA-COGECA](#), for example, warned that “*if left unchecked, this law has the ability to grow in an uncontrolled manner running away from its true purpose, the rejuvenation of nature*”. [ELO](#) welcomed the proposal but regretted “*the lack of an effective and inclusive action plan, and the lack of a bottom-up approach*”. [EUSTAFOR](#) stressed that indicators and related thresholds must consider existing methodologies and definitions, and challenged some of the conclusions on forest biodiversity. The [Swedish Forest Industry](#) was concerned “about inadequate use of scientific metrics and uncertainty over terms like “satisfactory levels”. **EURAF suggested** six wording changes, and circulated these to MEPs.

*Landscape features like small groups of trees are included in the definition of agroforestry, provided they are smaller, narrower, or less dense than the national definitions of "forest". More lower branch pruning is needed for the walnut trees shown in this image generated with Imagine-2*



### 1.2 Version 2 (20.1.23)

Version 2 noted the concern [voiced](#) by agricultural ministers about the lack of flexibility and time for Member States to meet the NRR targets, excessive shares of costs allocated to countries which already have high nature restoration levels, the use of Europe-wide indicators, which ignore differences between countries, and insufficient flexibility in the derogations allowed from the “non-deterioration requirement”. Forest targets and indicators were flagged as a particular problem for countries with large forest cover, and some of these countries had signed an [informal strategic partnership](#) to deepen cooperation in forestry management and policy issues. These countries stressed that commercial and social issues are as important as biodiversity in EU forests and stressed the need for a bottom-up approach to policy-making.

### 1.3 Version 3 (17.9.23)

Version 3 focused on the 120-page [draft amendments](#) coordinated by Cesar Luena MEP (5.12.22) and containing proposals to increase flexibility and derogations available to Member States, and to increase some of the targets. EURAF regretted the almost complete lack of amendments on agroforestry, and the continuing absence of proposals to use data from CAP IACS/LPIS datasets for monitoring landscape features. EURAF also regretted that

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features. These include, *inter alia*, buffer strips, rotational or non-rotational fallow land, hedges, **non-productive trees**, terrace walls, and ponds.” The concept of “non-productive trees” is not used in the [Implementing Act](#) of the CAP Strategic Plan which talks of “Landscape Features and Non-productive Areas”. However the CAP Strategic Plan Regulation and the Implementing Act sets the 4% threshold for Landscape Features and Non-Productive Areas ONLY for **arable land**.

<sup>3</sup> Accompanied by Staff Working Documents: [Full Impact Assessment](#), and [Executive Summary Assessment](#).



some Member States were continuing to keep this data secret, in apparent contradiction of the EU INSPIRE and REFIT directives

#### 1.4 Version 4 (6.2.25)

Version 4 covered the **draft Annex on "Uniform Format Nature Restoration Plans"**, which lists the reporting elements listed in Article 15(1) to 15(16) of the NRR (Content of the National Restoration Plan) as well as necessary elements from Article 14. The Annex has been reviewed by the new Nature Restoration Regulation Expert Group ([EO2210/18](#)), which includes Member State officials in charge of coordinating the work on the future draft Nature Restoration Plans. The following points were made in Version 4, and in the [public consultation](#), which closed on 7/2/2025:

1. **Confusion over the NRR definition of "Landscape Features"**. In the NRR "high-diversity landscape features" excludes "productive trees" - e.g. those used for animal fodder, unless these trees are part of "sustainable agroforestry systems" (BOX 1) but does not suggest a mechanism to quantify or delineate "sustainable agroforestry system". A much easier solution would have been to remove the confusing concept of "non-productive trees" ([ARC2020](#)). Similarly the NRR is mistaken in classing "temporary fallow" as a "landscape feature". In successive CAPs this has always been classed as a "non productive area" ([LF General Fiche](#) & Box I). Advice from DG ENV on detailed measurement of landscape features was due in mid-October 2024 but has not been released.<sup>4</sup>
2. **Insufficient mention of "agroforestry"**. EURAF regretted the absence of the word "agroforestry" in early drafts of the NRR. There are three mentions in the final text of Regulation [2024/1991](#): a) in Recital 54 as part of "extensive agricultural practices", b) as part of the explanation that "non-productive trees" can be regarded as "high diversity landscape features" if they are part of "sustainable agroforestry practices" (see BOX 1) and c) in Annex VII where "organic agriculture or agro-forestry, multi cropping and crop rotation, integrated pest and nutrient management" are listed as examples of "agro-ecological management approaches". However the link between agroforestry and woody landscape features is not made clear (i.e. woody "landscape features" are the tree-covered area, whereas "agroforestry" is the total area of a pilot including the area of grass and crops).

**BOX 1 - NRR Annex IV .. List of biodiversity indicators for agricultural Ecosystems referred to in Article 11(2) (including "high diversity landscape features", "grassland butterfly index" and "stock of organic carbon in cropland mineral soils"). MS must choose two from three.**

**Description:** *High-diversity landscape features, such as buffer strips, hedgerows, individual or groups of trees, tree rows, field margins, patches, ditches, streams, small wetlands, terraces, cairns, stonewalls, small ponds and cultural features, are elements of permanent natural or semi-natural vegetation present in an agricultural context which provide ecosystem services and support for biodiversity.*

*In order to do so, landscape features need to be subject to as little negative external disturbances as possible to provide safe habitats for various taxa, and therefore need to comply with the following conditions: (a) **they cannot be under productive agricultural use (including grazing or fodder production)**, unless such use is necessary for the preservation of biodiversity; and (b) they should not receive fertilizer or pesticide treatment, except for low input treatment with solid manure.*

*Land lying fallow, including temporarily, can be considered as high diversity landscape features if it complies with criteria set out under (a) and (b) of the second paragraph.*

*Productive trees part of **sustainable agroforestry systems** or trees in extensive old orchards on permanent grassland and productive elements in hedges can also be considered as high diversity landscape features, if they comply with criterion set out under (b) of the second paragraph, and if harvests take place only at moments where it would not compromise high biodiversity levels.*

<sup>4</sup> Article 14(7). Each Member State may, by 19 August 2025, develop a methodology to complement the methodology referred to in Annex IV [i.e. LUCAS], in order to monitor high-diversity landscape features not covered by the common method referred to in the description of high-diversity landscape features in that Annex. The Commission shall provide guidance on the framework for developing such methodologies by 19 September 2024"

## BOX 2 How are Landscape Features and Agroforestry measured in the CAP?

In the CAP Performance Monitoring and Evaluation Framework [Result Indicator](#) 17 data should be provided annually by Member States and is the area of "**Afforested land: area supported for afforestation, agroforestry and restoration, including breakdowns**". These breakdowns include:

17.1 Afforested area 17.2 Restored area, 17.3 Agro-forestry area, 17.4 woody landscape features created.

It is clarified that:

- 17.3 measures "the entire area supported under the intervention - that is including the whole agroforestry system (both cultivated agricultural areas and areas under the planted landscape features)
- 17.4 "measures only the area of planted wooded landscape features".

This information needs to be input to CAP [Impact Indicator](#) 21 (Share of agricultural land covered with landscape features).

*Unit: Percent (share of Utilised Agricultural Area).*

3. **Lack of agricultural tree planting and restoration targets.** Many publications stressing the environmental ([EURAF Brno Declaration 2024](#)) and climate mitigation/adaptation advantages ([Strategic Dialogue on the future of EU agriculture](#)) of agroforestry, but the opportunity was missed to include the EURAF Target of 10% tree cover on agricultural land by 2040 ([EURAF Agroforestry Vision 2024](#)). It became embroiled in the debate over the original NRR target of 10% coverage of "landscape features and non-productive areas". Again, the word "non-productive" was unhelpful, since it is possible to have 10% tree cover in our fields without assuming that the land between and beneath the trees will be "non-productive". The final NRR includes the 2030 Biodiversity Strategy target of "planting three billion additional trees" (Article 13), but lacks any new incentives, monitoring or resources to make this happen, or a clear focus on agricultural land. There is urgent need for new planting of trees outside forests and for the restoration of traditional silvoarable and silvopastoral areas. These landscapes used to play a vital part in Europe's agriculture, and it is a failing of the NRR that the initial target for 10% coverage of landscape features was removed in trialogue. This lack of targets could be ameliorated by Member States to declaring traditional agroforestry systems (like *dehesa*, *montado*, *streuobst*) as official "landscape features" and setting ambitious targets to improve the tree populations in these historical areas - linked to careful reporting using existing CAP Monitoring Methods (BOX 2).<sup>5</sup>
4. **Indices of agricultural and forest biodiversity are inadequate.** Previous versions of this Briefing pointed out that LUCAS ([JRC](#)) and Copernicus ([EEA](#)) methodologies are inadequate to monitor landscape features at a scale which means anything to landowners. The CAP IACS-LPIS system is the obvious reporting tool for landscape features (and was used in CAP 2007-2013). Its use should be recommended by the Commission to Member States ([EURAF Policy Briefing #69](#)). The details of monitoring methods in NRR Annex IV (agricultural ecosystems) and Annex VI (forest ecosystems) are sparse, and need to be identical to existing measures in the CAP - as described in its Performance Monitoring and Evaluation Framework ([PMEF](#)). Furthermore, some of the indices of forest biodiversity (e.g. connectivity, standing dead biomass, lying dead biomass) are features which encourage forest fires, and are inappropriate for much of Europe.
5. **CAP geostatistics need to be combined with those used for the NRR at parcel scale.** A draft typology of [ecosystems](#)<sup>6</sup> and potential restoration [measures](#) are under consideration by the NRR Expert Group. The latter seems to incorporate the conservation measures used for reporting under Article 17 of the Habitats

<sup>5</sup> Currently Member States can make a choice between any two of three two indicators out of a) the grassland butterfly index, b) the stock of organic carbon in cropland mineral soils or c) the share of agricultural land with high diversity landscape features. Thus removing any hope of consistent reporting across Europe.

<sup>6</sup> The PAF categories were based on the MAES typology – this has now been further developed into the EU typology for ecosystem accounting (under Regulation (EU) 2024/3024, amending Regulation 691/2011 on environmental-economic accounting).

Directive, and the Key Types of Measures used for reporting under the Water Framework directive. HOWEVER, most of the money available for restoration will come from the CAP and it is confusing for farmers and authorities to have two parallel sets of land mapping and classification systems (see [EURAF Policy Briefing #69](#)). EURAF recommends the recent typology of [nature based measures and farming practices produced by the JRC](#) (December 2024), and the classifications of forests, grassland, cropland, settlements, wetlands and other which are used for LULUCF emissions reporting ([EEA LULUCF Handbook](#)). The CRFC voluntary carbon farming geospatial registry aims to be comparable with "wall to wall" methods used by Member States for GHG LULUCF reporting by 2028.<sup>7</sup> EURAF also recommends that the NRR environmental classes should be mapped into the IACS/LPIS field-parcel system used by farmers - enabling a cross reference between DG AGRI and DG ENV classifications and measures.

6. **Duplication of information with Adaptation Strategies, Adaptation Plans, GHG Inventories and National Energy and Climate Plans.** Most of the suggested text in the Annex on climate mitigation and adaptation is already produced by Member States in other statutory reports and can be removed from the "Uniform Format". EURAF points out that the FAO definition of "forest" used in the EU Deforestation Regulation and Forest Monitoring Regulation Reporting is causing unnecessary confusion, when each Member State has its own definition in its forest law. These national definitions are listed in Annex II of the LULUCF Regulation (see [EURAF Policy Briefing #15](#)). Further confusion is caused by the category of "forest and woodland" given in the MAES and Corine classifications of the NRR - which uses yet another definition (i.e. 30% tree cover). Similarly, each Member State has its own definition of "permanent grassland", including different amounts of shrub vegetation (see [EURAF Policy Briefing #29](#)). The only reliable, country specific, source of land use information is the Member States' CAP Land Parcel Information System (LPIS). However, only around half of Member States made this geospatial information available in their INSPIRE Geospatial Portals. **The remainder of MS are non-compliant with legislation agreed almost 20 years ago (2007/2/EC), yet no enforcement action seems to have been taken.** Nevertheless, the LPIS, as it stands in most countries, is limited only to agricultural information: there is a great opportunity for the integration of forest and environmental classifications into this single, parcel-based, system. The Spanish SIGPAC system is an excellent example of what could be done more widely. **Clarification of the time-periods for reporting is not consistently given.** **Article 20 (Monitoring)** lists a range of indicators which Member States are expected to monitor (BOX 3). The Biodiversity Indicators listed in point C (i.e. Article 11(2)) need to be reported only every six years, and should indicate an "increasing trend" at a national scale. While many indicators are required to be measured and reported annually. Frequency and consistency of reporting should be improved - particularly for landscape features.
7. **Examples of restoration measures (referred to in NRR Annex VII) do not yet link to improvements in CAP monitoring tools.** EURAF welcomes NRR Annex VII para 16 (*Introduce high-diversity landscape features in arable land and intensively used grassland, such as buffer strips, field margins with native flowers, hedgerows, trees, small forests, terrace walls, ponds, habitat corridors and stepping stones, etc.*) and para 17 (*Increase the agricultural area subject to agro-ecological management approaches such as organic agriculture or **agro-forestry**, multi cropping and crop rotation, integrated pest and nutrient management.*) but notes that major parcel scale improvements in CAP monitoring and coding in the IACS/LPIS system will be needed before they can be geospatially recorded.
8. **High Spatial Accuracy of regenerated areas is not guaranteed.** For 19 indicators Member States are allowed to provide information as a "NUTS 3 reference (i.e. province), 10x10km grids or free polygons". This cannot provide the consistency of reporting needed across Europe and it is recommended that polygon (i.e. parcel) reporting is mandatory.

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<sup>7</sup> EURAF will work on two projects to develop this registry, funded under the call [HORIZON-MISS-2024-SOIL-01-07](#)

### BOX 3 ... Explanation of Nature Restoration Regulation Article 20 (Monitoring)

- A. condition and trend in the condition of the habitat types, and the quality and the trend in the quality of the habitats of the species referred to in Articles 4 (i.e. *Terrestrial, Coastal and Freshwater systems*) and 5 (i.e. *Marine Systems*) in the areas subject to restoration measures on the basis of the monitoring referred to in Article 15(3), point (p) (i.e. *monitoring of areas subject to restoration*);
- B. the area of urban green space and urban tree canopy cover within urban ecosystem areas, as referred to in Article 8 (i.e. *no net loss of urban green space and urban tree canopy cover by end 2030 and increasing trend thereafter*) and determined in accordance with Article 14(4) (i.e. *Member States can choose whether this includes peri-urban areas*);
- C. at least two of the biodiversity indicators for agricultural ecosystems chosen by the Member State in accordance with Article 11(2) (i.e. *grassland butterfly index, stock of organic carbon in cropland mineral soils, **share of agricultural land with high-diversity landscape features***);
- D. the populations of the common farmland bird species listed in Annex V (i.e. [Brlík et al 2021](#));
- E. the biodiversity indicator for forest ecosystems referred to in Article 12(2) (i.e. *Common forest bird index – [Brlík et al 2021](#)*);
- F. at least six of the seven biodiversity indicators for forest ecosystems chosen by the Member State in accordance with Article 12(3) (i.e. *standing deadwood; lying deadwood; share of forests with uneven-aged structure; forest connectivity; stock of organic carbon; share of forests dominated by native tree species; tree species diversity*);
- G. the abundance and diversity of pollinator species, according to the method established in accordance with Article 10(2) (i.e. *to be defined in a Delegated Act to be written by 19.8.25*);
- H. the area and condition of the areas covered by the habitat types listed in Annexes I and as defined in the Habitats Directive (92/43/EEC i.e. *terrestrial, coastal and freshwater*) and Annex II (i.e. *marine habitats*);
- I. the area and the quality of the habitat of the species referred to in Article 4(7), and Article 5(5) (i.e. *species listed in the Habitats Directive and the Directive on the conservation of wild birds*);
- J. the extent and location of the areas where habitat types and habitats of the species have significantly deteriorated and of the areas subject to compensatory measures taken under Article 4(13) (i.e. *application by Member States of the “non-deterioration requirement at the level of biogeographical region”*), as well as the effectiveness of the compensatory measures to ensure that any deterioration of habitat types and habitats of the species is not significant at the level of each biogeographical region in their territory and to ensure that meeting the targets and fulfilling the objectives set out in Articles 1 (i.e. *Subject matter*), 4 (i.e. *Restoration of terrestrial, coastal and freshwater ecosystems*) and 5 (i.e. *Restoration of marine ecosystems*) is not jeopardised.

*Note that monitoring for A starts as soon as restoration measures are put in place; monitoring for B, C, D, E and F starts on 18.8.24; monitoring for G starts one year after entry into force of the Delegated Act; monitoring and reporting for C and will be carried out **at least every six years** (initially covering 18 August 2024 until 31 December 2030); monitoring for E and G will take place every year; monitoring for H and I will take place every six years.*

## 2. Version 5 - additional comments on Commission Notice C(2025/980)

The “Guidance on a framework for developing methodologies to monitor high-diversity landscape features pursuant to Article 14(7) of the Nature Restoration Regulation (Regulation (EU) 2024/1991)” was published in the Official Journal on [14.2.2025](#). It provides advice to Member States on how they may develop a methodology to measure “high diversity landscape features”, and more specifically “(i) *productive trees in sustainable agroforestry systems*; (ii) *trees in extensive old orchards on permanent grassland*; and (iii) *productive elements in hedges*.” It confirmed that these areas:

- a) *cannot be under productive agricultural use (including grazing or fodder production), unless such use is necessary for the preservation of biodiversity; and*
- b) *should not receive fertilizer or pesticide treatment, except for low input treatment with solid manure.*

*“Productive trees which are part of sustainable agroforestry systems or trees in extensive old orchards on permanent grassland and productive elements in hedges can also be considered as high diversity landscape features, if they comply with criterion set out under (b) of the second paragraph, and if harvests take place only at moments where it would not compromise high biodiversity levels. ... For the purposes of the Guidance “a tree or an element in a hedge is defined as productive when it has been planted for the harvesting/use of any of its parts (fruits, bark, branches, timber) and is under active management (e.g. hedge laying, other regular cutback and*



*sometimes grafting and pruning). Trees planted for productive purposes are considered as productive from the moment they are planted, because they will be managed accordingly from that moment.”*

However, derogations are allowed for “*productive trees in sustainable agroforestry systems*”, and a section is added to identify these “*sustainable agroforestry systems*”, including quoting the definition of agroforestry from CAP Regulations and the FAO and ICRAF versions. It is also noted that Member State provided their own agroforestry definitions in their CAP Strategic Plans (see EURAF [Policy Briefing #22](#)). Additionally it is noted that MS could decide to use tree cover thresholds on agricultural parcels to define agroforestry. The FAO thresholds of 5% (“other wooded land”) and 10% (“forest”) are mentioned.

Use of the IACS GSAA and LPIS data was also recommended, and Member States are advised to use the following steps:

1. Use national maps of agroforestry, providing these are of significant quality. Perhaps by delineating LPIS agricultural areas and “*distinguishing between arable land, permanent grassland and permanent crops to identify agroforestry systems*”. MS are given the choice over which the tree cover density threshold to use. Alternatively MS are allowed to use EUNIS/CORINE habitat types (e.g. Class 2.2.4), or even to revert to LUCAS data to derive a “*probability of occurrence of agroforestry*”.
2. Once areas of agroforestry have been identified MS are expected to define areas of “*sustainable agroforestry systems*” according to the “*biogeographical specificities in the Member State or a region thereof and by specific type of agroforestry*”. It is suggested that MS could define minimum and maximum stocking tree densities and the type of management which should be applied.
3. Member States are advised to use two criteria to determine sustainability: a) design of the AF system in terms of species composition etc), b) management practices.
4. Areas which receive pesticide and fertiliser treatment would not be “sustainable” - except a low input of solid manure (with 30-50 kg N per ha per year suggested). Farmers would be expected to make declarations as part of their IACS or State Aid claims, verified with on the spot surveys and interviews. or by checking the biodiversity value of the landscape features (e.g. by using EMBAL).
5. Estimating the productive tree covered area (given that only the productive trees count as landscape features and not the entire parcel), using orthophotos, Copernicus tree-cover density, field surveys, satellite images, or agroforestry management plans.

Similar guidance is given for “*extensive old orchards in permanent grassland*” and “*productive elements in hedges*”.

**Conclusion:** There are 20 complicated pages of guidance **ALL of which has been necessitated by the failure to remove the distinction between “productive” and “non productive” trees, as was strongly recommended by EURAF**. We have long argued that ALL agricultural trees are productive since they produce, timber, fuelwood, fruits and environmental services. This Guidance Note will be unnecessary if the adjective “non-productive” is removed from all legislation applied to agricultural trees. Given the pressure on European forests to meet carbon removal and bioeconomy needs it must be made clear that all agricultural trees can have both economic and environmental values. We therefore recommend that the “*Rural Simplification Omnibus*”<sup>8</sup> in Q4 of 2025 removes all mention of “non-productive” trees from the NRR. Similarly, it should be clear that “High Diversity Landscape Features” are exactly the same as the ordinary “Landscape Features” already monitored in the CAP Regulations and which were measured by MS using methods developed for the EFA Layer of LPIS systems as part of compliance with the Greening Regulation in the previous CAP.



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<sup>8</sup> which will focus on non-CAP legislation affecting farmers and foresters.