

# 69. Governance and performance of the CAP: the role of agroforestry

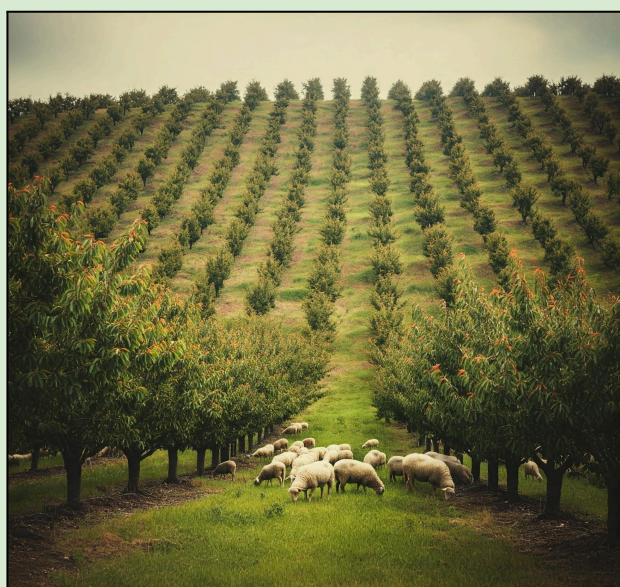
*EURAF Policy Briefing #69. Version 2 - 28.10.24, Gerry Lawson, Constantin Muraru (EURAF) , Sonja Kay (AGROSCOPE)<sup>1</sup> 10.5281/zenodo.12706886*



*EURAF is an NGO, based in Montpellier and Brussels (Transparency Register ID of [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.*

*Policy Briefing #69 Version 1 was produced as an input to a [discussion paper](#) from DGAGRI on “Governance and Performance of the CAP”, circulated to the CAP Civil Dialogue Group technical meeting on 12.4.24. Version 2 updates most sections. Discussion on the Forest Monitoring Regulation stresses the need to use national legal definitions of forest rather than seeking to impose a single definition, and the advantage of having parcel-by-parcel information on land use and landscape features. A new section welcomes the Strategic Dialogue on the Future of*

*Agriculture ([link](#)) and its emphasis on improving data quality and availability. In addition to the Farm Sustainability Data Network, the Dialogue should have stressed the importance of making progress on the Farm Sustainability Tool for Nutrients and the GreenData4All Initiative. An EU Rural Data Governance Framework is needed to get buy-in from the sector on types of data which can be freely shared, and those which must be restricted.*



*Future landscapes 1. Wild cherry (*Prunus avium*) planted over permanent grassland to provide shelter and shade for animals. Lower branches should be pruned more than in this photo to improve the form of tree-stems, provide animal fodder and allow more light to reach the grass sward.*

## **Recommendations**

- 1. Metrics for the new CAP Delivery Model should truly be based on performance rather than compliance.*
- 2. The DGAGRI CAP online dashboards give greater data availability, but serious double counting persists.*
- 3. Tree-planting metrics should include data from countries which have withdrawn forestry from the CAP and merge “business as usual” and “additional” datasets*
- 4. Landscape-feature metrics in the NRR and the CAP should be improved and harmonised.*
- 5. Private and public sector tree planting data should be harmonised in a single data portal with parcel information - such as proposed for the CRCF.*
- 6. The EU GreenData4All Initiative is vital to improve access to environmental geospatial data.*
- 7. Use of the EU Farm Sustainability Tool for Nutrients should be included in the Soil Monitoring Directive.*
- 8. CAP Plans need to be modified urgently to meet projected land-sector GHG emission-reduction shortfalls.*
- 9. LULUCF and agricultural GHG reporting need better integration with CAP data sources.*
- 10. Monitoring is needed of uptake of the Commission’s “Biodiversity-Friendly Tree Planting Guidelines”.*
- 11. The forest definition in the Forest Monitoring Regulation should match the EU LULUCF Regulation.*
- 12. Carbon Farming certification should be planned to follow on from CAP tree-planting support.*
- 13. A statutory Agri-ETS will be needed before extending the CBAM to agriculture and forestry.*
- 14. A Rural Data Governance Framework is needed to move forward the emphasis on data in the Strategic Dialogue on the Future of Agriculture.*

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## ***DGAGRI Question 1 “Combining Performance on implementation and performance on objectives” (aka “What data should be collected to help the CAP deliver its objectives?”)***

*(DGAGRI Suggested Topics: communication on achievements, efficient support to beneficiaries, strategic programming, assurance, planning of outputs, results, policy objectives, stakeholders’ expectations, capacity building, annual performance report, performance review, safeguards, controls.)*

### ***1. Metrics for the new CAP Delivery Model should truly be based on “performance” rather than “compliance”.***

The Commission claims ([link](#)) to have changed the agricultural funding model from one of “compliance” to one of “performance”. However, the “Performance, Monitoring and Evaluation” metrics used for the current CAP mainly monitor spend or beneficiary numbers for measures which Member States “map” against the 10 Specific Objectives or 44 [Result](#) Indicators (on a 1-to-many basis), or 37 [Output](#) Indicators (on a 1:1 basis). For the first two, impressive indicators of spend can be produced, but double counting makes the data almost meaningless. A lot of indicators are framed with wording like R.14 (“share of UAA under supported commitments to reduce emissions or maintain or enhance carbon storage”) which don't have any quantitative link to emissions reduction..

More interesting than the Result and Output Indicators are the 49 Impact Indicators. However, these are usually available only at a national or regional scale, where they are unable to demonstrate the real “impact” of specific policies in the CAP. The [Impact Indicators](#) of most relevance to monitoring the impact of agroforestry - once they can be implemented at a farm scale - are:

- **I.9 Improving the resilience of agriculture to climate change:** includes a) agriculture income stability, b) crop production stability for cereals, c) water exploitation index, d) soil organic carbon in agricultural land - only available at NUTS 1 or NUTS 2 (region) level.
- **I.10 Greenhouse gas emissions from agriculture:** uses national GHG emission calculations which vary greatly and are usually published only at a national level (NUTS 0). Only a few MS estimate the impact of woody vegetation separately.
- **I.11 Enhancing carbon sequestration:** based on the LUCAS soil survey therefore not available at farm or parcel scale. Averaged to NUTS2
- **I.12 Increasing sustainable energy in agriculture** - agroforestry can contribute to this, but the indicator is published at national (NUTS 0) scale
- **I.13 Reducing soil erosion:** scale is different between countries. Usually only published at regional scale (NUTS2)
- **I.14 Improving air quality:** based on manure management and fertilisation, but doesn't include the effect of ammonia sorption by agroforestry. Published only at national scale (NUTS 0)
- **I.15 Improving water quality** - reports separately for the potential threat of nitrate and phosphorus on arable land and groundwater. Reports separately for cropland, grassland and permanent crops, but again availability is at the NUTS 0 level, and not for all MS.
- **I.16 Water use in agriculture:** but the frequency of sampling and the density of the monitored stations vary from country to country, as does the number of sampling stations over the years. Published at river basin level.
- **I.17 Reducing pressure on water resources:** calculated for the Water Exploitation Index but only available at national level, or sometimes for river basins.
- **I.19 Increasing farmland bird populations.** Available at country (NUTS 0) level only. Most species will benefit from hedgerows and trees but other species (e.g. skylark and lapwing) prefer open land - therefore a less integrated index is needed.
- **I.20 Percentage of species and habitats of Community interest related to agriculture with stable or increasing trends:** but again this is only available at NUTS 2/3 level and relates to broad habitat types
- **I.21 Agricultural land covered with landscape features:** but this is currently only available at NUTS 3 (province) level based on LUCAS data from the [JRC](#), or for woody landscape features based on Copernicus from the [EEA](#)

Almost no information is available on agroforestry or forestry in these databases. There is no indication of the area of agricultural land where area support (BISS) is judged by inspectors to be ineligible because of tree-cover (including hedges and small copses), yet this “ineligibility” is one of the main factors dissuading farmers from engaging in agroforestry. Improved summary information is also needed on the small number of measures which directly support agroforestry (Table 1). They are only partially coded by MS using indicators for tree establishment/restoration (**Result Indicator R.17**) or annual tree-planting maintenance payments (**Output Indicator O.16**). Only 17 measures from a combined total of 948 in Articles 31 (ECO), 70 (AECM) and 73-74 (INVEST) specifically mention agroforestry (DigitAF Project [Deliverable 1.1](#)).

MS	Article	Code	O.16 (total)	R.17 (total)	Measure
BE-FL	Art 70	3.7	€281,384		Management of agroforestry systems (boslandbouwsystemen)
CZ	Art 70	26.7	€1,357,200		Caring for an established agroforestry system
CZ	Art 73-74	42.73		€3,917,700	Establishment of an agroforestry system
DE	Art 31	DZ-0403 –			Maintaining agroforestry management on arable land and permanent grassland
EL	Art 31	P1-31.05 –		€66,564,568	Improvement of agroforestry ecosystems, rich in landscape elements
ES	Art 70	6502.2	€27,069,248		Maintenance of Forests and Agroforests
ES	Art 73-74	6881.1		€68,809,809	Non productive investments in afforestation and agroforestry systems
IT	Art 70	SRA28	€66,080,718	€66,080,718	Support for maintenance of forestation/afforestation and agroforestry systems
IT	Art 73/74	SRD05		€47,387,981	Forestation/afforestation and agroforestry systems on agricultural land
PL	Art 70	I.8.8			Afforestation and afforestation premiums and agroforestry schemes
PL	Art 73-74	I 10.13.		€5,998,785	Establishment of agroforestry systems
PT	Art 70	C.1.1.3			Agroforestry Mosaic (Attributed to O.14 and R.14, R31, R.33)
PT	Art 70	D.2.2			Management of the montado (agroforestry) by Results
PT	Art 73-74	C.3.2.2		€3,360,000	Setting up agroforestry systems
PT	Art 73-74	F.2.2		€300,000	Investment in the creation and regeneration of agroforestry systems
SK	Art 70	70.01	€2,932,150	€2,932,150	Protection and maintenance of trees within the established Agroforestry system
SK	Art 73-74	73.01		€2,932,150	Establishing an agroforestry system

**Table 1:** Measures in Member States which specifically refer to agroforestry. New measures are being developed in Austria and the Netherlands. France and Ireland have measures outside the CAP

## 2. DGAGRI Online Dashboards of spend on national CAP measures are an improvement but need more verification and less double counting

Three new platforms: the [Result Indicators Dashboard](#), the [Catalogue of CAP Interventions](#), and the [Financial Allocation to CAP Specific Objectives](#) are provided by DGAGRI. They are timely and easy to use. However, they need further checks on the consistency of indicator codes used by Member States. For example, a number of measures dealing with agroforestry are not attributed to the forestry/agroforestry planting code (R.17), nor to the forestry/agroforestry annual support code (O.16). Impact Indicators should be recorded at a farm-scale, particularly CAP “[Impact Indicators](#)”. For this to happen, Member States should provide open access to their Land Parcel Identification Systems (LPIS) to researchers, and the long-promised Farm Sustainability Tool for nutrients (FaST) should be completed (qv). Recommendations in the Court of Auditors Special Report in 2022 on “Data in the Common Agricultural Policy” should be acted upon ([link](#)).

## 3. Tree metrics should include data from MS which have withdrawn forestry from the CAP, and merge public-supported and “additional” planting data..

Seven Member States (IE, NL, SE, FI, LU, FR, DE - except two Lander) now finance forestry and agroforestry through funds exclusively outside the CAP. They follow state aid rules defined in the Agricultural Block Exemption Regulation (see EURAF [Policy Briefing #19](#)). They may do this to “reduce bureaucracy”<sup>2</sup>, but it means that the Commission has little visibility on the “business as usual”<sup>3</sup> tree-planting numbers, despite assuming that they are around 300 million/year. It is recommended that the Commission’s [MapMyTree](#) portal should therefore report both the “state-funded, or business-as-usual” tree planting and the “additional” trees planted as part of the 3 Billion-Tree initiative. Since the LULUCF Regulation in 2018 Member States have an obligation to track the location of all tree planting causing land use change (i.e. “afforestation”), so creation of a unified “public” and “private” tree-planting database should be in their interest.

## 4. Landscape-feature metrics in the NRR and the CAP should be improved and harmonised.

Use of the term “[non-productive trees](#)” in the Biodiversity Strategy and the Nature Restoration Regulation (NRR) has caused great confusion. The [final approved text](#) of the NRR improved this, but MS should take the opportunity to ensure that the rules for collecting data on "High Diversity Landscape Features (HDLF) in the NRR" are the same as "Landscape Features" (CAP GAEC-8). Differences are currently small. HDLF measurements should not include “temporary fallow” since, from the time of the Greening Regulation this has been viewed as a “non productive area” rather than a “landscape feature”. Following a commitment in Article 11 of the NRR, the Commission is working on new guidelines that member states can use for the collection of more detailed landscape

<sup>2</sup> Some MS use the ABER Regulation to enable 100% of actual planting costs to be reimbursed. Others use it to allow annual maintenance payments for longer periods than permitted in the CAP - e.g. up to 20 years in the case of Ireland.

<sup>3</sup> Also expected to be 300 million trees per year but currently far short.

feature data. The Commission, EEA and JRC have a role to support these improvements, particularly in reinforcing the LPIS system, which is the only feasible source of this data at a farm-scale ([link](#)).

Landscape-feature metrics at an EU scale are extremely broad-brush: CAP Result Indicator 34 (money spent on landscape features) is confusing, as it includes money spent on permanent crops like olives and vineyards. Impact Indicator 21 data at a pan-EU scale is provided by the [JRC](#) using LUCAS subsampling, and by the EEA using Copernicus data for “woody” landscape features. Yet both datasets are only available at NUTS3 level ([link](#)). The EU-funded DigitAF Project offers an alternative method using Copernicus tree-cover-density and Corine grassland/cropland categories at 100x100m pixel resolution (**Future Landscapes 2**). This “tree-desert” map [is also available](#) at NUTS3 level. Additional analysis using IACS/ LPIS data is needed at national level to quantify landscape features at **farm-scale**. This level of resolution is needed to support future CAP Pillar II “payment by results” schemes, and to link to carbon-farming certification.

“High Diversity Landscape Feature” targets (10%) were removed from the NRR during the co-legislation process, and the 4% target for GAEC 8 (landscape feature area) was removed from the CAP through the Simplification Regulation ([link](#)), however the simplification proposals also contained a commitment for all MS to ensure that Article 31 ecoschemes support the maintenance and establishment of landscape features.<sup>4</sup> Consistent monitoring if needed for this through Result Indicator 17.4 (area of landscape features established). However, member states often do not split R.17 area targets and reporting into the four areas which were requested in the CSP Regulation and Delegated Act (R17.1 afforestation, R17.2 forest-restoration, R17.3 agroforestation, R17.4 lines of woody landscape features).

### ***DGAGRI Question 2 “Designing efficient administrative processes to support delivery” (aka how can the data be collected?)***

*(DGAGRI Suggested Topics: interventions, support schemes, efficient processes, monitoring and reporting requirements, digitalisation, geographical & sectoral diversity, coherence in requirements, technical support)*

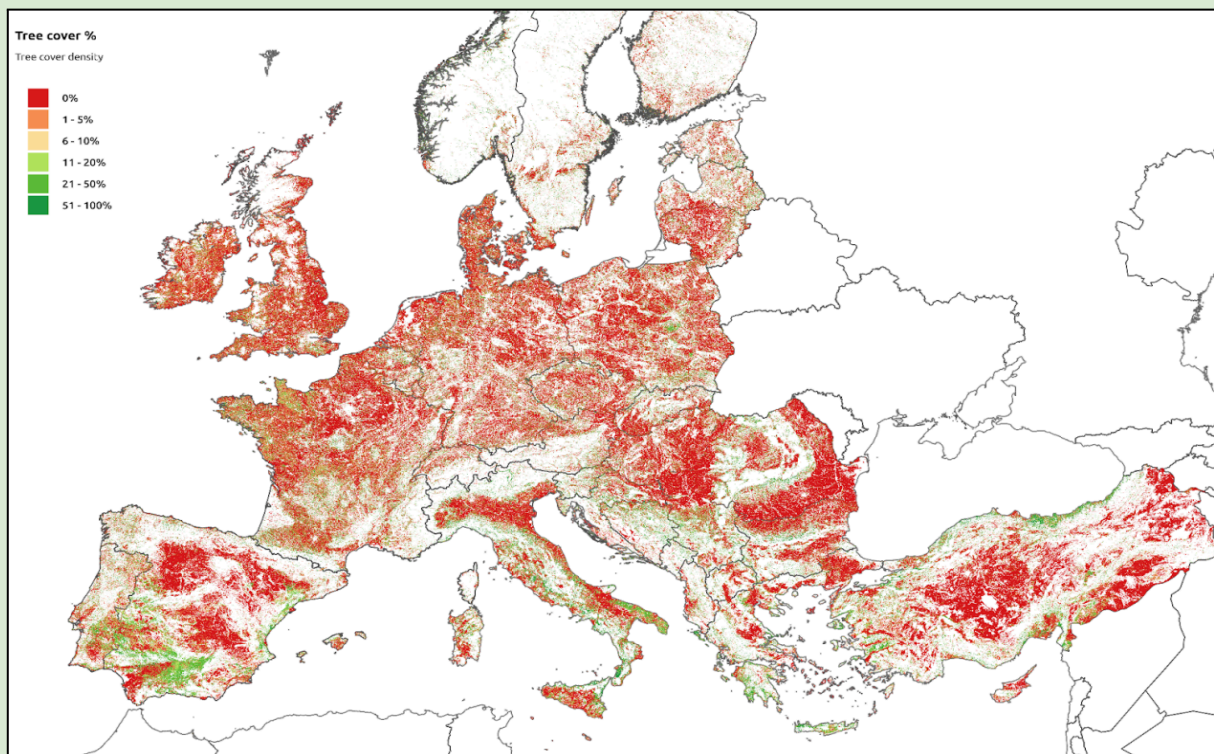
### **5. Private and public sector tree planting data should be harmonised in a single data portal.**

The Sustainable Finance Initiative (SFI) ([2020/852](#)) and Three Billion Tree initiative relate to tree planting in the private sector, rather than “business as usual” tree planting supported by Member States. The SFI sets climate and environment criteria for activities which are classed as sustainable: including forestry and paludiculture. The Delegated Acts for Climate ([2021/2139](#)) and Environment ([2021/2178](#)) are important, as is the EU [Taxonomy Navigator](#).

EURAF has submitted a technical proposal to include agroforestry in the SFI taxonomy (Policy Briefing [#28](#)) and is working on Policy Briefings for the other aspects of sustainability listed (“do no significant harm”) in the SFI, i.e.: adaptation - (Policy Briefing [#27](#)), water quantity and quality (Policy Briefing [#64](#)), pollution (Policy Briefing [#65](#)), biodiversity (Policy Briefing [#66](#)) and the circular economy (Policy Briefing [#67](#)). Acceptance of agroforestry into the Sustainable Finance Initiative should facilitate its increased utilisation in Europe and will contribute to its uptake within the Carbon Removals Certification Framework ([link](#))

***Future Landscapes 2. The map shows Tree-Cover-Density (TCD) on agricultural land (minus permanent crops like olives) in 39 EEA countries. Areas of white are non-agricultural. Red shows areas of “tree deserts”. Copernicus TCD for 2018 is superimposed on Corine agricultural land for 2018. Each pixel covers 1 ha (100 m x 100 m). EURAF’s Mission statement is to “help achieve 10% tree cover on agricultural land by 2040”. If this vision is successful the map below will turn green. (source DigitAF Project 2023).***

<sup>4</sup> Press release [15.3.2024](#). “**GAEC 8 on non-productive features**: EU farmers will have to maintain existing landscape features on their land but will no longer be obliged to dedicate a minimum part of their arable land to non-productive areas, such as fallow land. Instead, they may choose, **on a voluntary basis**, to keep a share of their arable land non-productive - or establish new landscape features (such as hedges or trees) - and thereby receive additional financial support via an **eco-scheme that all Member States will have to offer in their CAP Strategic Plans**. All EU farmers will be incentivised to maintain non-productive areas beneficial for biodiversity without fearing loss of income”. [COM 2024 139](#) Article 1 confirms that in Article 31 of Regulation 2021/2115), the following paragraph 1a is inserted: ‘As a part of the eco-schemes referred to in paragraph 1, Member States **shall** establish and provide support for schemes covering practices for the maintenance of non-productive areas, such as land lying fallow, **and for the establishment of new landscape features, on arable land**. These schemes shall be voluntary for active farmers and groups of active farmers.’ This amendment is also included in the Council’s agreed text.



### 6. The EU GreenData4All Initiative is vital to improve access to environmental geospatial data.

The Commission's GreenData4All initiative ([link](#)) will evaluate the implementation by Member States of EU INSPIRE Directive (2007). It hopes to assist Europe's green and digital transformation by updating EU rules on environmental geospatial data and on public access to environmental information. GreenData4All should enable greater sharing of data between the public & private sectors and with the general public, and "unlock the full benefits of data sharing for data-driven innovation and evidence-based decisions". It is very relevant to the sharing of the soils and land-use information needed for Carbon Removals certification and for LULUCF reporting of land use change. Details of the initiative, following a consultation in 2023 (ref) remain to be finalised.

### 7. The EU Farm Sustainability Tool for Nutrients should be stressed in the Soil Monitoring Directive.

The Soil Monitoring Directive ([COM2023-415](#)) requires the creation of "soil districts" throughout the territory of Member States. Soil districts should "constitute the basic governance units to manage soils and to take measures to comply with the requirements laid down in this Directive, in particular with regard to the monitoring and assessment of soil health" BUT the Directive indicates that there need not be more "districts" than the number of NUTS1 units, of which there are 92 in the EU. This is far too coarse a spatial division to be of use to the CRCF, or any other legislation requiring spatial land planning and management. The draft SMR expects MS to implement an enhanced LUCAS topsoil monitoring programme and to integrate with national databases of soil properties. EURAF is awaiting progress with parcel-scale recording of soil data in the Farm Sustainability (FaST) Platform from Member States by the end of 2024, as committed in the Sustainable Carbon Cycles Communication (see EURAF [Policy Briefing #25](#)). It is surprising that the FaST platform is not mentioned in the Soil Monitoring Directive.

### DGAGRI Question 3: Fostering an inclusive dialogue and building trust? (aka why is data collected)?

*(Suggested Topics: shared management, collaboration, partnership principle and involvement of stakeholders, involvement of national, regional and local authorities, penalties vs. incentives, trust, diversity, subsidiarity).*

### 8. CAP Plans need to be modified to meet projected land-sector GHG emission reduction shortfalls.

Member States were obliged to Indicate under the terms of the CAP Strategic Plan Regulation Article 120 on the modifications to the current CAP which would be needed to help them meet their 2030 LULUCF (-310 MtCO<sub>2</sub>e) and Effort Sharing targets. DGCLIMA should publish these letters, since there is little evidence that MS have



indeed modified their CAP Strategic Plans to better meet these targets or to improve their GHG accounting methods ([Court of Auditors, 2024](#)). As of 18.10.24, only 11 Member States had published final versions of their National Energy and Climate Plans and few of these had recognised the importance of agroforestry in meeting AFOLU emission reduction targets. France is a notable exception.<sup>5</sup> DG CLIMA last year published guidance on “*improving the contribution of land-use, forestry and agriculture to enhancing climate, energy and environment ambition*” ([May 2023](#)) and their December 23 “[EU-wide assessment](#)” was a clear indication of the huge scale of the shortfall in emissions reduction.

*Future Landscapes 3. Baroso cattle in the Montado system of cork and holm oak in Southern Portugal*

### 9. LULUCF and agricultural GHG reporting need better integration with CAP data sources.

The LULUCF Regulation ([2018/841](#)) was updated in 2023 ([2023/839](#)) to set ambitious EU and national targets. The amended Regulation has removed certain flexibilities from 2026 onwards, or made them dependent on the EU as a whole reaching its targets. The Regulation, in Annex II, also defines “forest land” using the Marrakesh Accord ([2021](#)) thresholds for block size, crown cover and tree height, consistent with reporting made by Member States to the UNFCCC upon which LULUCF compliance is assessed. The UNFCCC definition should have been used in the EU Forest Monitoring Regulation ([PB#15](#)) since compliance with UNFCCC and national laws are of primary importance. It was disappointing that the Communication on Europe’s 2040 climate target removed the 2035 land-sector neutrality commitment ([COM 2024 final](#)) present in the earlier proposals under the Green Deal and the February 2024 [Impact Assessment](#)<sup>6</sup> EURAF issued a [press release](#) indicating that agroforestry could contribute 56 MtCO<sub>2</sub>e by 2040 if a planting programme of 750 kha/yr starts in 2025. Member States are currently considering how to redirecting unspent rural development funds to support farmers, forest owners and SMEs which are affected by extreme weather events (a total amount of up to 600 million EUR), EURAF estimates that investing *only 1%* of such budgets per year in targeted agroforestation activities (e.g. establishment of new systems in areas most vulnerable to climate catastrophes) could contribute to accelerating progress on LULUCF targets - while also reducing the damage caused by extreme weather events by up to 50%. See v4 of EURAF [Briefing #17](#) “Agroforestry and the LULUCF Regulation”.

### 10. Monitoring is needed of uptake of the Commission’s “Biodiversity-Friendly Tree Planting Guidelines”

The section on agroforestry in the Biodiversity Friendly Tree-Planting Guidelines ([March 2023](#)) was written with EURAF’s assistance. The document supports authorities, foresters, farmers, landowners and civil society to better implement biodiversity-friendly afforestation, reforestation and tree-planting projects at the local level. However, as pointed out by the forestry sector when the Forestry Strategy was proposed, it may not be the job of the Commission to publish guidelines which have no statutory function and which duplicated a number of similar guidelines published by Member States, or internationally ([Forest Europe](#)) and through certification bodies like the [ESC](#) and the PEFC. Perhaps DGENV could undertake a study of the uptake of these guidelines, and whether their use has been encouraged by Member States?

### 11. Forest definitions in the Forest Monitoring and LULUCF Regulations should match

EURAF welcomed the draft Forest Monitoring Regulation (FMR) and supports improved monitoring of forests and trees-outside-forests, particularly for LULUCF and CRCF purposes. The indicators in Annex I are excellent<sup>7</sup>.

<sup>5</sup> Final National Energy and Climate Plans published by 16.10.24 (with mentions of “agroforestry”) [DK\(0\)](#), [FI\(1\)](#), [FR\(28\)](#), [LV\(0\)](#) [IT\(6\)](#), [NL\(2\)](#), [SE\(0\)](#), [ES\(4\)](#), [IE\(2\)](#), [LU\(3\)](#), [DE\(0\)](#).

<sup>6</sup> a climate-neutral land sector is still mentioned on p22 but there is no date.

<sup>7</sup>a) Forest area, b) tree cover density, c) forest type, d) forest connectivity, e) defoliation, f) forest fires (events, burnt-areas, severity, post-fire erosion, post-fire recovery) g) wildfire risk assessment, h) tree cover disturbances.

Those in Annex II<sup>8</sup> need significant consultation with MS and industry. EURAF notes that there are large areas of grassland recorded in national LPIS systems which meet the FMR’s unitary definition of “forest”, yet are legally classified as grassland and are in receipt of CAP BISS payments. The legal indicator of “forest land” is provided by national forestry laws, national cadastres and LULUCF reporting. Imposing a single EU “forest” definition in the FMR will complicate LULUCF reporting (EURAF Policy Briefing #17).<sup>9</sup> An alternative approach is to develop integrated rural cadastres which merge forest inventories and CAP-LPIS agricultural geostatistics, as has been done superbly in the Spanish SIGPAC system, partly to meet the needs of the LULUCF Regulation. EURAF has developed a pilot project proposal to support research on how to extend this integrated rural cadastre to other MS.

## 12. Carbon Farming certification should be planned collaboratively with CAP tree-planting support.

EURAF’s [Policy Briefing #8](#) suggests integrated planning for carbon farming. Starting with CAP Pillar I Ecoschemes (Article 31) for planning and baseline sampling in year 0, followed by Pillar II Investment measures (Article 74) in year 1, and Pillar II AECM (Article 70) for annual maintenance support in years 2-5, and subsequent “adoption” into carbon-certification schemes in five-year tranches i.e. yrs 6-10, 11-15, 16-20 etc. Mapping and registration of trees outside forests (ToF) as “landscape features” could give guarantees of “permanence” for carbon-certification. [Policy Briefing #20](#) gives further suggestions and will be modified in 2024/25 as the Commission develops its Carbon Farming Delegated Act for the Carbon Removals Certification Framework. The concern to avoid a small amount of “**financial additionality**” should not stand in the way of the urgent need to get trees into the ground as fast as we possibly can: recognising that for at least the first five years they sequester practically no carbon!

## 13. An Agri-ETS is a prerequisite to extend the Carbon Border Adjustment Mechanism (CBAM) to agriculture and forestry, and should be prioritised

The Carbon Border Adjustment Regulation ([2023/956](#)) aims to ensure that imports have paid a price for the carbon emissions produced during their manufacturing. This makes the carbon cost of imports comparable to domestic production, safeguarding the EU’s climate goals. It will apply to specific goods like cement, iron and steel, aluminium, fertilisers, electricity, and hydrogen – industries that have high carbon emissions and are at risk of carbon leakage. It currently excludes forestry and agricultural imports, despite amendments suggested by [COMAGRI](#), and other views (e.g. [Allan Matthews 2022](#)). Before any surcharges can be placed on imports of food and agricultural produce it is likely that the EU will have to introduce a statutory carbon-pricing scheme for agriculture and forestry, such as currently under discussion ([Trinomics 2023](#)). This will need a national registry of agricultural and forestry parcels, as proposed in the Carbon Removals Certification Framework for 2018.



*Future Landscapes 4. Agroforestry trees in widely-spaced lines provide environmental and economic services. The tree-lines should be recorded as “landscape features” by farmers to maintain agricultural payments, They will be regularly pruned to maintain the form of the trunks and let light into the crop or grass-sward.*

<sup>8</sup>a) Forest available for wood supply or not available for wood supply; b) growing stock volume per ha; c) net annual increment per ha; d) stand structure; e) tree species composition and richness; f) European Forest Type; g) removals; h) deadwood; f) location of forest habitats in Natura 2000 sites; j) abundance of common forest birds; k) location of primary and old-growth forests; l) protected forest areas; protected forest areas; m) production and trade of wood products; n) forest biomass for bioenergy.

<sup>9</sup> EURAF Policy Briefing #15 has been updated with an example from Spain of the huge errors possible when “forestry” is identified in a database which does not exclude areas which are “predominantly agriculture”.

#### 14. A Rural Data Governance Framework is needed to reconcile conflicts over data access mentioned in the Strategic Dialogue on the Future of Agriculture.

The main mentions of “data” in the Strategic Dialogue ([link](#)) are listed below. Agroforestry is relevant to all of them. It is surprising that there is no mention of the EU Green Data4All Initiative or the EU Farm Sustainability Tool. The Final recommendation on the need to improve sustainability indicators is particularly welcome. The “Data Governance Framework” could be tackled in the proposed GreenData4All Initiative.

- *Agri-food value chain partners are key innovators and drivers of competitiveness. They are key contributors to maintaining lively rural communities and providing jobs. Digitalisation supports greater customer service, engagement, and information, and enables better demand forecasting and **sharing of data** for sustainability.*
- *Impact measurement and comparability of **farm-level data** will play an increasingly important role in the transition process. In that context, action will need to be taken to protect farmers’ rights and data.*
- *Farmers position in the value chain can be supported by capacity building in the form of access to technology, innovation, skills, **data, digital tools**, networking, and independent assistance*
- *The Farm Accountancy Data Network (FADN) should be further developed into the **Farm Sustainability Data Network (FSDN)** and implement methodologies to collect sustainability data at farm level.*
- *In the case of banks, to mobilise funding, they need to be sure that projects fit within policy sustainability targets and that the farmer or agri-food operator will be able to continue their activities for the coming years. To this end, **clear indicators and pathways** must be established and reflected in the prudential framework; at the same time, banks should be able to count on data protection regulations and the question of consent quality, **reliable data**, in line with ownership rights, that is sufficient to inform such benchmarks and risks analyses.*
- *The Commission should present, every three years and based on the benchmarking system, a ‘State of Agri-Food’ report taking stock of the progress achieved towards all three dimensions of the sustainability of EU agri-food systems and **identifying data gaps**.*
- *Animal welfare legislation requires the involvement of many actors: breeders, medicine providers, farmers, transporters, slaughterhouses, veterinarians, processors, retailers, consumers, NGOs, scientists etc. The challenge is to draw on **appropriate scientific data**, have the right transition periods, harmonise the rules, and provide farmers with the right tools and knowledge to take action*
- *Technologies for groundwater monitoring and **digital tools** to monitor the quantitative and qualitative status of water and soils are highly relevant. They should be developed in cooperation with the agricultural sector, including by the development of collaborative structures in order to **disclose the relevant data** to the relevant authorities and to the public. The European Commission should provide guidelines to Member States on the use of such instruments.*
- *As climate change and other economic, social, and geopolitical transformations impact competitive advantages, it is essential to design contingency planning to absorb and adapt to these structural changes. Therefore, based on **information and data provided by EU Member States**, the European Commission should conduct a strategic mapping of the structural shifts in agri-food production, as well as of key risks and vulnerabilities.*
- *Food systems are becoming increasingly digital. Today, in parts of Europe, crops, animals, or trucks are more and more monitored by smart sensors, satellites, drones, and machinery equipped with GPS and cameras. The result is a **wealth of data with unprecedented potential to support smarter decisions** by businesses or consumers, to trace food integrity, and to support public decision making by governments.*
- *The shift towards digitalization transcends mere technological advancements; it entails profound social, cultural, economic, and institutional changes. **Data utilisation can offer significant benefits** and support the benchmarking system and data exchange in the agrifood systems. It also raises concerns about fairness, quality and privacy. Hence, **robust data governance frameworks** and their proper implementation are essential.*
- *To promote digitalization in agri-food systems, the European Commission and Member States should prioritise and work towards a **transparent data governance model** with clear rules on data ownership, interoperability and ethical use, aiming at fair and secure use of data for the benefit of all, taking into account legal and ethical aspects.*
- *Incentives, e.g. within the CAP framework, are needed for the adoption of precision agriculture technologies, including IoT sensors, drones, AI, and satellite imagery, thereby improving resource efficiency and crop management. This must go hand in hand with sufficient funding for research development and **application of data acquisition**, interpretation and development of relevant algorithms and AI tools.*
- *Overall, robust **monitoring and evaluation** mechanisms need to be established to assess the impact of digitization initiatives in the agri-food sector. Data on adoption rates, productivity gains, **environmental outcomes**, and **socio-economic results** should be collected to inform future policy decisions*
- *There is a need for more and better data on the sector’s sustainability, to be integrated with **consistent metrics and clear indicators**, as well as for close monitoring and regular evaluations of agri-food actors’ sustainability performance.*





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