



Verein zum Schutz der Bergwelt e.V.

gegründet 1900, gemeinnütziger und nach Art. 42 BayNatSchG anerkannter Naturschutzverein in Bayern

April 11th 2011

Proposal of the VzSB (English version)

to the European Commission

**regarding the reform
of the EU-Mountain Agriculture Policy
in the framework
of the Common Agricultural Policy (CAP)
2014-2020 programming period**

Content

Correspondence to the European Commission dated January 20th 2011

Translation of the VzSB-proposals regarding the CAP dated January 20th 2011

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An die Europäische Kommission
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Date
January 20th 2011

Verein zum Schutz der Bergwelt proposal regarding the reform of the EU mountain agriculture policy in the framework of the EU Commission's consultation procedures on the Common Agricultural Policy (CAP) for the 2014-2020 programming period.

Title: „Impact assessment of current proposals regarding CAP until 2020“

Dear ladies and gentlemen,

bearing in mind its responsibility as a nature conservation organisation with focus on the Alps, the Verein zum Schutz der Bergwelt e.V. is contributing to the current consultation procedure of the EU Commission in the context of the Common Agricultural Policy's reform for the 2014-2020 programming period. Despite declining agricultural expenditures within the EU-budget, the new agricultural policy is supposed to increasingly integrate other policy fields and aspects of nature conservation and environmental protection. Within the current CAP-period 2007-2013, these aspects have not sufficiently been reflected. In the interest of a sustainable and future-oriented mountain agriculture as well as of safeguarding Europe's most important biodiversity reservoir, we demand a CAP reform that duly reflects its ecological responsibility for the Alps.

With Alfred Ringler's comprehensive 2009 contribution „Almen und Alpen. Höhenkulturlandschaft der Alpen. Ökologie, Nutzung, Perspektiven“, we have not only compiled the current state of knowledge on ecology and Alpine pasturing for all Alpine states. Furthermore, we have formulated concrete proposals for an ecological modernisation of the CAP regarding high mountains.

For further information regarding the „Almbuch“, visit www.vzsb.de and follow the link „Almbuch“.

Our proposals for the revision of the EU mountain agriculture policy are scientifically grounded and take the following directives and guidelines into consideration:

1. Communication of the EU-Commission, dated November 18th 2010, on the post-2013 reform of the CAP „The CAP towards 2020: Meeting the food, natural resources and territorial challenges of the future“, http://ec.europa.eu/agriculture/cap-post-2013/communication/index_en.htm

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2. EU implementation assessment dated October 8th 2010 on the EU Biodiversity Action Plan (BAP) 2006, which concluded that the objective of containing the loss of biodiversity has clearly been failed. (http://ec.europa.eu/environment/nature/biodiversity/comm2006/pdf/bap_2010/1_DE_ACT_part1_v1.pdf)
3. Report of the European Environmental Agency (EEA) dated October 19th 2010 on the state and trend of Europe's biodiversity (<http://www.eea.europa.eu/publications/eu-2010-biodiversity-baseline/>)
4. Implementation objectives regarding the EU Natura 2000-directives:
 - 4.1 Habitats (FFH)-Directive adopted in 1992
<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:31992L0043:EN:NOT>
 - 4.2 Birds Directive adopted in 1979
<http://eur-lex.europa.eu/LexUriServ/site/en/consleg/1979/L/01979L0409-20070101-en.pdf>
 - 4.3 Including mandatory preservation objectives of each Natura2000 area and regarding protection an management of these areas.
5. Results of the first health check regarding species and habitats of the Habitats Directive dated 2008 (only 17% of species and habitats feature a favourable conservation status) (http://ec.europa.eu/environment/nature/info/pubs/docs/nat2000news/nat29_en.pdf), cf. pg. 3ff
6. Implementation objectives of the EU Water Framework Directive adopted in 2000 on ecosystems not depending on water bodies (<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:32000L0060:EN:NOT>)
7. Implementation objectives of the EU Floods Directive adopted in 2007 regarding necessary flood protection in alpine sections of river ecosystems (<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:32007L0060:EN:NOT>)
8. Implementation objectives of the Alpine Convention, binding under international law (http://www.alpconv.org/NR/rdonlyres/71BEF2FB-5F49-4600-B389-290554A3D13D/0/Framework_en.pdf) and its implementation protocols (binding in all EU-Alpine states and for the EU Commission, since December 18th 2002)
 - Spatial Planning and Sustainable Development (http://www.alpconv.org/NR/rdonlyres/CA8D3547-B915-47B7-A5B9-52CEAC2D4ACF/0/Protokoll_RaumplanungGB.pdf),
 - Mountain Farming (<http://www.alpconv.org/NR/rdonlyres/FEEB3016-F728-4DFC-82DF-E151A9060309/0/MountainfarmingProtocolEN.pdf>),
 - Conservation of nature and countryside (http://www.alpconv.org/NR/rdonlyres/529579D0-B214-46A1-B52D-14097E0CF59B/0/protokoll_naturschutzGB.pdf),
 - Soil conservation (<http://www.alpconv.org/NR/rdonlyres/F720F0F4-2608-4CF6-8A62-4BEC3F7F56A8/0/SoilProtocolEN.pdf>)
9. Implementation objectives of the EU Sustainable Development Strategy adopted in 2001, including its assessment in 2009 and its link to the Lisbon strategy („EU 2020“), (<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:52001DC0264:EN:NOT>)
10. Assessment of economic benefits arising from ecosystem services and use carried out within the 2010 TEEB study, stressing the benefits arising from comprehensive consideration of biodiversity (<http://www.teeb.org>)
11. Ecosystem-oriented approach for biodiversity protection in Natura 2000 areas as well as beyond
12. Synergies resulting from integrating the CAP with environmental policies
13. EU Biodiversity Action Plan's (BAP) policy fields on biodiversity and climate change as well as the EU White Paper dated April 1st 2009 regarding adaptation to climate change (Sustaining resilient ecosystems provides numerous benefits, including carbon storage, protection against floods and soil erosion etc.) (<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=COM:2009:0147:FIN:EN:PDF>)
14. EU proposal for a Soil Protection Directive, dated September 22nd 2006 (<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=COM:2006:0232:FIN:EN:PDF>), see also: http://ec.europa.eu/environment/soil/three_en.htm

15. Resolutions of the Global Strategy Plan 2011-2020 passed in October 2010 at the 10th Conference of the Parties of the Convention on Biological Diversity in Nagoya / Japan (<http://www.cbd.int/cop10/>)

Please find attached our proposals regarding post-2013 CAP reform.

We call on the responsible bodies of the EU Commission to consider the proposals of the *Verein zum Schutz der Bergwelt* on the future of EU mountain agriculture when drafting the legal CAP proposal for the post-2013 period.

We would gladly outline our suggestions personally together with Mr. Alfred Ringler. In the context of this paper, some details had to be omitted for brevity's sake.

As an attachment, we have included a complementary copy of the „Almbuch“.

For the Executive Board of the Verein zum Schutz der Bergwelt.
With kind regards

Prof. Dr. Michael Suda
Chairman

Dr. Klaus Lintzmeyer
Secretary to the Board

Appendix:

- „Proposal of the Verein zum Schutz der Bergwelt e.V. regarding the revision of the EU-mountain agriculture policy in the framework of the Common Agricultural Policy (CAP) for the 2014-2020 programming period“
- Specimen of the „Almbuch“ by Alfred Ringler



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Datum
January 20th 2011

Verein zum Schutz der Bergwelt e.V. proposal regarding the reform of the EU-Mountain Agriculture Policy in the framework of the Common Agricultural Policy (CAP) 2014-2020 programming period

(Please note the respective correspondence to the European Commission, GD Agriculture and Rural Development dated January 20th 2011 in the context of the European Commission's public consultation procedure on the Common Agricultural Policy (CAP))

RINGLER (2009)* includes a transalpine SWOT (Strengths – Weaknesses – Opportunities - Threats) analysis of current mountain agriculture from an ecological point of view, providing the basis for the following proposals. Further reading provide the chapters of RINGLER (2009).

*) „Almen und Alpen. Höhenkulturlandschaft der Alpen. Ökologie, Nutzung, Perspektiven“ (2009) von ALFRED RINGLER; Ed. Verein zum Schutz der Bergwelt, Munich. Short version 134 pg., Long version 1448 pg. on CD. ISBN 978-3-00-29057-2; see also: www.vzsb.de, link „Almbuch“.

1 Point of departure – CAP 2007-2013 assessment from a mountain ecological point of view

1.1 CAP not suitable for high montains

The basic CAP architecture is designed for the natural, structural and operating preconditions of lowlands. Specific requirements of the European high mountains have apparently not sufficiently been taken into consideration in the past or have even been overlooked entirely. Solutions that have been developed in the mountain state of Switzerland are thus an important guideline in view of redesigning the post-2013 CAP. Deficits of the current CAP in Alpine territories are particularly obvious in the field of biodiversity. Local and regional endangerment of rare Alpine plants and species can only to a minor extent be attributed to touristic development, they are mostly due to agricultural changes, particularly local overgrazing, abandonment, insufficient pasture clearing, eutrophication through overfertilizing in high altitudes and along ridges, inappropriate use of glacial forefields and Alpine bogs (assessment for the French Alps: CHAS 1994). These phenomena can unfortunately be registered since the coming into effect of the new CAP after 1992; they can

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also be traced to outer-Alpine mountain areas such as the Romanian Carpathians and the Pyrenees, particularly as a consequence of modified sheep husbandry. (RINGLER (2009) provides evidence and literature reference, see Chap. 2.6.5, 5.6.5, 5.6.6). In Chap. 2.7, conflicts resulting from inappropriate pasture farming are addressed for each livestock category.

1.2 Appropriate mountain agriculture is indispensable for sustaining Alpine biodiversity

Mountain agriculture is indispensable for landscape development in the Alps and has acquired its justifiable role. It is however confined by natural limits. These are met when

- the distributive pattern of species and natural communities is disturbed,
- sensitive habitats are permanently damaged,
- soil erosion, land slides, topsoil denudation, and peak discharge increase instead of decrease,
- the cultural-historic, regional identity is being lost.

Alps, Pyrenees, Carpathians and Balcans are the most important European hotspots of biodiversity. A sustainable future strategy for Alpine cultural landscapes thus needs to encompass all parts of the Alps as well as other European high mountain areas, as each region is contributing to the European biodiversity pool with its unique set of species and natural communities as a function of the respective use pattern. An extensive characterisation of man-made Alpine biodiversity is provided in chapters 2.6 and 2.7 of RINGLER (2009), focussing particularly on keystone species requiring specific use provisions.

1.3 Containing forest expansion is not enough

Current Alpine schemes of mountain subsidies do to some extent take into consideration a certain ecological qualification (summer pasture premiums only for limited stocking rates, no nitrogen fertiliser etc.), but are nonetheless based on a single success indicator: large-scale maintenance of pasture clearings (i.e. „maintenance of cultural landscape“, limiting further forest expansion). The federal state of Salzburg has put it this way: Contractual conservation – an instrument for keeping the landscape open (Natur + Land H. 1/2004, Salzburg). Ecological targets are no longer tied to environmental compensatory payments. This is not enough.

1.4 Separating agricultural from conservation areas is generally inappropriate in high mountains – agricultural policy must take into account the complex character of Alpine cultural landscape

Alpine habitats are complex landscapes, in which a multitude of different habitats intertwine. Even more than in the lowlands should subsidies consider solutions for the entire farm unit and for coherent landscapes. Established criteria for ecological compatibility and efficiency of lowland farm management are unapt for high mountains (cf. RINGLER 2009, Chapters 2.7 and 4.3).

In high mountains above the valley bottoms, agricultural use has produced a zone of high landscape quality and biological diversity. With the exception of some agricultural areas in or close to valley bottoms, the entire agricultural area of high mountains has acquired an ecological quality that cannot be adequately compensated through particular schemes of CAP's second pillar.

This compensation however is currently not taking place (apart from some contractual nature conservation areas), resulting in an exorbitant discrimination and insufficient funding of mountain farmers. A separation between agricultural land and conservation areas, ecologically sensitive and insensitive areas does not make sense in high mountains. Beyond comparatively intensive farmed valley bottoms, every hectare is essentially part of an eagle's, bearded vulture's or eagle owl's habitat.

The objectives of agriculture, of nature conservation and of touristic landscape management are to be enacted on the same and not on separate and isolated patches of land. Tying relatively high basic support bonuses to criteria of „agricultural use“ respectively „maintenance of agricultural area“ is simply not appropriate.

The efficiency of direct payments in terms of ecological or landscape quality is insufficient, particularly in regard to high mountains and thus needs to be improved. This is the only way to avoid endless fragmentation of programmes, leading to overwhelming controlling efforts in the Second Pillar. Merely Switzerland has already taken first steps towards an ecologically consistent implementation. These experiences can be taken advantage of and transformed to the EU context.

1.5 Maintenance of high mountain cultural landscape is at stake

Nearly all expert opinions expect a further decline in cattle density / stocking rate, a further intensification at lower altitudes and a further retreat of agricultural use from steep and high altitude pastures (except sheep). Alpine dairy farming / cheese-making is coming to an end in some areas due to a lack of cows (as a consequence of increased suckler cows stocking). Alpine pastures that could easily be kept in use under the current bonus and steering scheme, are under sufficient, often too heavy use.

If a fixed rate bonus per hectare leads to only rich grasslands being used as pastures and low-return extensive pastures being neglected, the spending system needs to be reviewed. This issue is being analysed in-depth in chapters 5.2 and 5.10 of RINGLER (2009).

1.6 Alpine culture landscape must be made climate-change proof

Land use changes that adjust mountain agriculture to challenges of climate change should be specifically promoted, e.g. land use practices producing water-retaining vegetation and soils (dwarf-shrub heathland, Alpine bogs) or being less dependant on rural roads. The Achilles heel of future alpine pastures are their access roads. In places where they cross steep slopes, torrents or gullies, they are more vulnerable than most pastures and - in the context of diminishing public spending readiness - need to be safeguarded against increasing slope and torrential dynamics. Chapter 6.2 summarises potential climate change scenarios for mountain agriculture, the following illustration giving an example. Extreme events such as this will not take place everywhere, but do point out the importance of precautionary land use measures.

Stierregalp / Mettenberg close to Grindelwald glacier / Bernese Oberland after a major mudslide in 2005

The cottage no longer exists. From OCCC (2007): Klimaänderung in der Schweiz 2050.-

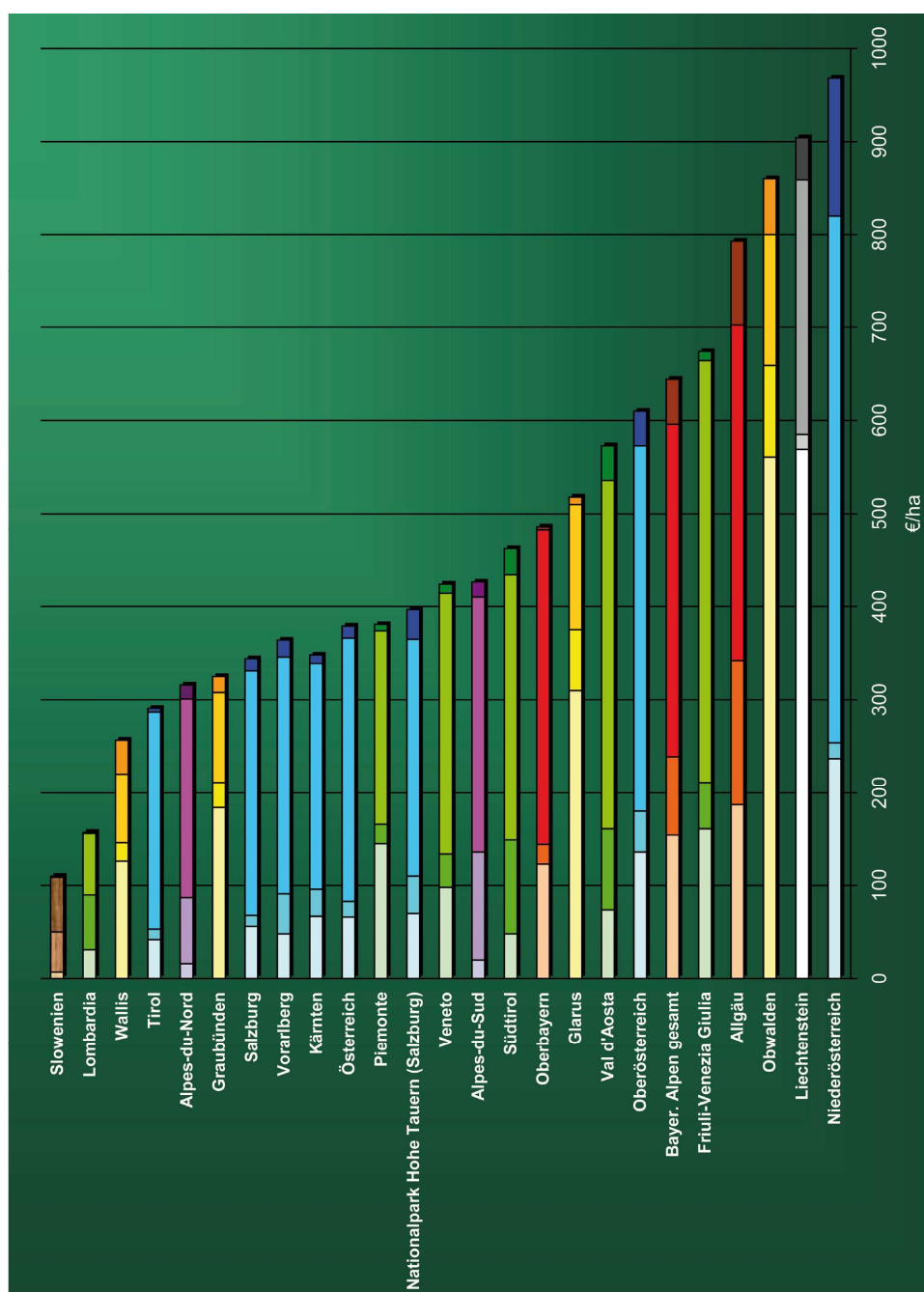
<http://www.occc.ch/products/ch2050/PDF>. The 40 m gully has ripped the lateral moraine and is in the process of undermining the cottage.



1.7 For high mountain areas, the CAP is not balanced and leads to a distortion of competition among regions

The Alps are an ecosystem and market with similar handicaps and management goals. It is thus unacceptable to set completely different priorities through regional programmes. Similar environmental performance is currently rewarded vastly different among farm enterprises as well as among states and regions. In some Alpine regions, almost identical working processes and conservation achievements are compensated far better than in other regions.

The following chart outlines total funding per hectare of Alpine pasture in EUR for selected Alpine regions in 2004. The columns read from top downwards: Animal payments – investment support – acreage payments – contractual nature conservation. Note the huge differences particularly regarding individual funding components such as contractual nature conservation or livestock bonus. Source: „Almen und Alpen. Höhenkulturlandschaft der Alpen. Ökologie, Nutzung, Perspektiven“ (2009) ALFRED RINGLER, pg. 90 of the short version.



A comparative analysis of these almost scandalous differences is carried out in chapter 3.3. Examples of imbalances include:

- In Cantabria (Spain), the intensification and fertilisation of mountain pastures is a core funding objective, while in Switzerland and Germany, the opposite is being funded.
- In Italy, dairy production is given priority in sub-alpine areas, in Germany and Switzerland not.
- Germany is strictly separating pastures and forest, whereas Rhone-Alpes, Aquitania and Midi-Pyrenees promote the reintroduction of wood pastures (cf.: Mountain Policies: Analysis of mountain areas in EU member states.- Final Report, 2003, www.europa.eu.int/comm/regional_policy/sources/docgener/studies/pdf/montagne/mount9.pdf).

1.8 Ecologically effective mountain farming policies of high mountain states are not shared across borders

The European Commission should use its influence to promote the expansion of effective funding schemes and income generating mechanisms across national borders. Switzerland's mountain policies should be regarded as an inspiration in this context. An in-depth analysis of these elements is provided in chapter 3.3 of RINGLER (2009). Relevant, transferable approaches include comprehensive packages for farm enterprises as a whole.

1.9 High mountains are GMO-free

Essential element of the ecological redesign of post-2013 European agricultural policies is the renouncement of genetic engineering for agriculture. Valley floors as well as alpine pastures are to be determined as GMO-free areas. In regard to high altitude agriculture, this includes the ban of feed containing GMO and genetically engineered livestock. The ban of genetic engineering agriculture also preserves biodiversity of animals and plants.

1.10 Excessive control bureaucracy / regulation versus individual responsibility

Over-regulated funding schemes lead to a lack of control. This can be addressed in three ways:

- Result- instead of measure-orientated payments.
- Compensation not only for current ecological conditions, but for medium-term management practices.
- Implementation of as many objectives as possible in the form of absolute conditions within the First Pillar instead of as single payment schemes within the Second Pillar.

What we need is action based on understanding. In vegetation patterns of alpine pastures, ecological achievements cannot be assigned to and controlled for certain plots of land. Nonetheless, these ecological achievements of land users are part of the overall performance of an Alpine pastoral area. As the acceptance of ecologically ambitious management practices is closely tied to their level of voluntariness, controlling efforts need to be limited to absolutely essential measures (cf. chapter 6 of RINGLER (2009)).

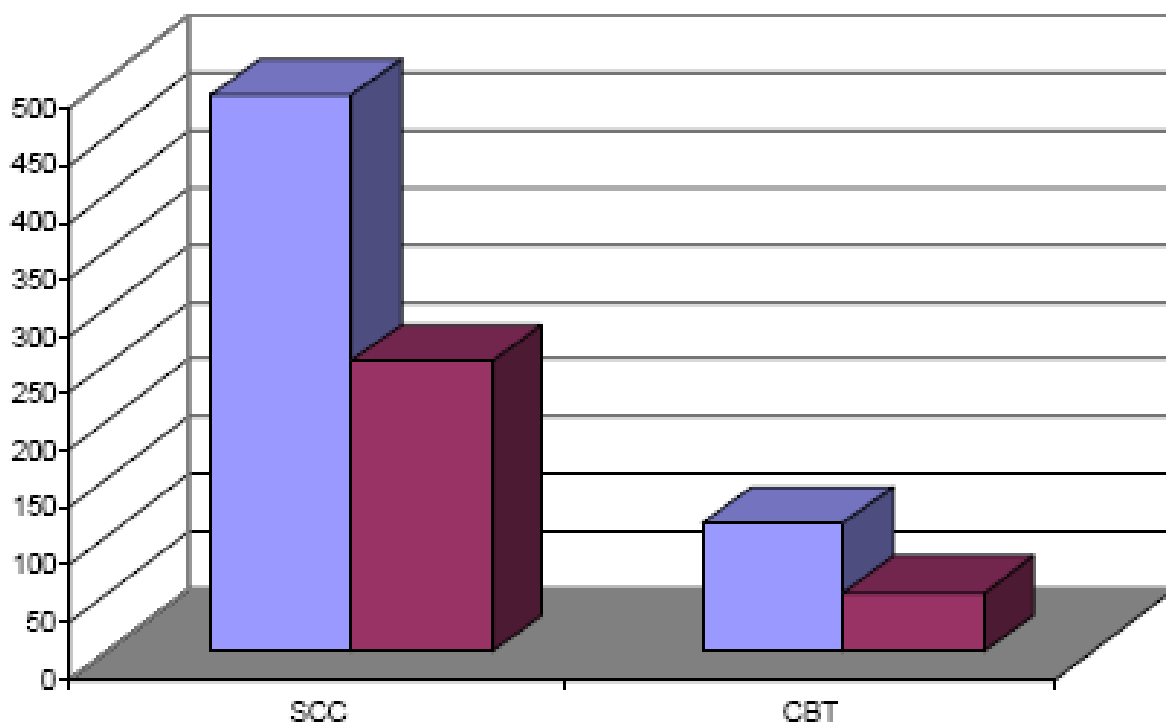
1.11 Intensification is not an option for high mountains

Considerable economical disadvantages of dairy production on summer farms must be more, not less, reflected in post-2013 agricultural policies. The competitiveness of dairy cow keeping and dairy cow pasturing, which cannot be compensated through labelling for higher consumer prices of Alpine produce, is being widely challenged. If 80% of dairy cow stock would be summered, lowland production costs of 40 to 45 cent per litre would rise up to 80 cent per litre.

Ecologically questionable intensification phenomena and local soil erosion are currently not the result of excessive stocking rates, but rather of insufficient dispersion and shepherding of cattle. These ecologically questionable side-phenomena of low-diversity pastures as a result of dairy farming and Alpine slurry application are addressed and analysed in chapter 5.6 of RINGLER (2009).

Somatic cell count and bacteriological indication in lowland and mountain pasture milk.

Source: TIMINI (2008). SCC = Somatic Cell Counts (1000 per ml), CBT = carica batterica totale (total bacteria; 1000/ml). Blue: 3 alps in Valle Spluga / Prov. of Sondrio with 250 dairy cows from 50 farms. Red: Respective lowland farms.



1.12 Funding objectives cannot be controlled through remote sensing

Successful or failed achievement of landscape and ecological objectives cannot be decided solely or predominantly on the basis of aerial or satellite monitoring. This practice runs the risk of creating clear land use borders on the ground that can easily be detected from space, proving fatal for the existence of ecotones (complex transitory habitats, extremely extensive pastures with fallow shares, forest pastures, tree groups, open edges of woods etc.) and faunistic conservation in general. In cases where programme monitoring is currently or in the future carried out through remote sensing techniques, differentiated assessments of certain vegetation qualities, micro-structures and vegetation complexes appear necessary.

1.13 The preservation of Alpine landscapes must be achieved with less live stock

Under the conditions of decreased stocking and unchanged land use practices, the large majority of ecologically valuable oligotrophic pastures is set to fall fallow. Intensified shepherding and low fertilisation could reduce this risk substantially.

As a large-scale loss of low yield mountain pastures would substantially reduce landscape attractiveness and biodiversity, it needs to be questioned whether and how large shares of current pastures can be kept from natural succession and alpine pastures be sustained with fewer livestock (measured in livestock units). Measures include:

- (1) Reducing the total yield of a mountain pasture, i.e. core high yield pastures should sustain fewer livestock for a shorter period of time. This can be achieved through extensification of core pastures and reducing respectively discontinuing input of feed, mineral fertiliser or manure from outside as well as land use practices that lead to a strong concentration in the immediate vicinity of cottages and milking parlours.

- (2) More active shepherding and free-range pasturing in order to direct grazing towards peripheral areas. Rotation grazing can probably only be maintained on parts of the overall Alpine pasture area.
- (3) Livestock exchange between strongly and weakly stocked alps as far as local tenure and legal practices and the willingness to cooperate among alps permit. The establishment of pastoral co-operatives can facilitate this on a local scale.
- (4) A change in livestock (under defined preconditions regarding sheep and goats outlined in chapter 5.2 of RINGLER 2009) potentially distributes grazing pressure on pastures.

2 Proposal for a post-2013 CAP reform

US president Truman is said to have wanted a one-armed advisor, as his advisors always argued: „One the one hand....., on the other hand....“. We opt for „one hand“. The following proposals reach beyond the conventional EU policy framework, as they potentially interact with national implementations of the Second Pillar and can thus inspire a permanent dialogue between the European Commission and national governments. In the future, the European Commission should initiate, moderate and demand what has been omitted in the past with grave consequences for Alpine cultural landscape and biodiversity: a persistent and sustainable co-ordination across regional and national borders. If not, it assumes responsibility for inconsistent regional and nation programmes that fail to provide adequate management for the Alps, Europe’s core biodiversity hotspot.

2.1 Direct payments - Greening of the First Column

2.1.1 Discontinue uniform farm bonuses

The point has already been made above. In high mountains, obviously, the largest thinkable discrepancies exist in regard to agricultural conditions. The funds necessary for balancing tremendous local cultivation handicaps and additional ecological services are being diverted for blanket distribution. Uniform bonuses are by definition unfair in this context.

2.1.2 Splitting the First Column in basic subsidy and environmental supplementary premium

The environmental premium integrates previous compensatory allowances and takes into account – at least to some extent - the enormous differences in cultivation conditions and ecological vulnerability across different agricultural and eco-management-zones (cf. 2.1.3). The share of agricultural income not based on production increases from zone I to VIII. A distinct difference should be made in environmental supplementary premium between high nature value farmland (HNV) and other agricultural zones in order to create a clear incentive for extensification of grassland and pastures towards more structured landscapes.

2.1.3 Mountain farming regions as an approach for graduating environmental supplements

Elements of the successful Swiss direct payment framework are adapted to specific needs of EU Alpine countries. A detailed geographical explanation of farm regions can be provided in subsequent discussions. The minimum and maximum level differ between various Alpine regions.

Classification criteria for the proposed zones are outlined in chapter 4 of RINGLER (2009). The zonal classification in fact represents a simplification of the Swiss mountain agriculture payment regionalisation, which foresees a total of 5 zones without taking into account the huge range and scope of European high mountains. In regard to a single Alpine state, a maximum of 4 zones apply. This classification includes farms that specifically cultivate alpine and montane landscapes and plains, each implying unique duties and responsibilities. A harmonisation with high nature value farmland (HNV-zones) - which still need to be officially delineated – appears possible (cf 2.1.2 and 2.2.8 as well as appendix III).

I Cattle-keeping grassland farm of hill/plain region without higher summering areas, mostly intensive grassland

- II Crop/wine/fruit farms in the plains with alp**, almost exclusively located in Italy
- III Grassland farms in the plain/hill region with summering areas**, extensive grassland only on mountain pastures
- IV Lower Alpine grassland farms**, continuous extensive grassland, with alps
- V Higher altitude grassland farms**, continuously extremely extensive grassland
- VI High mountain summering farms**, continuously very extensive
- VII Sheep transhumance farms** (currently only in the French, Italian, Romanian, Bulgarian and Spanish mountains), possibly a future option for containing landscape degradation in other Alpine states
- VIII „Wilhelm Tell-Farms“**: Farms dedicated to alpine landscape preservation with a focus on steep slopes and hummocky meadows; farmland respectively leaseholds can be fragmented over a large area.

The delineation and subsidisation of each single zone is based on the usual criteria of compensatory payments, but is being modified according to regionally differing grassland yield, the share of extensive grassland etc. Linking these zones to hotspots of Alpine biodiversity is an option (cf. appendix I).

2.1.4 Compensatory allowance

Compensatory allowances (= ICHN in France) – up until now part of the Second Column, even though they are rather zone-specific direct payments – are being replaced by environmental allowances. Their label might change, but their effects remain the same, possibly even closer to reality and more fair. In regions above 1,000 m altitude with uniform compensatory payments irrespective of height and local conditions, they lead to a substantial discrimination of farmers cultivating extremely difficult, remote and exposed areas. The relation between direct payments and compensatory allowances has in the past been particularly vague in regions e.g. above 1,000 m altitude where standardised rates have been handed out at (e.g. 230 EUR/ha). In countries where compensatory payments have been strongly differentiated according to individual farm situations (e.g. AT), interim solutions could be established.

2.1.5 Replace cross compliance with Good Agricultural Practice in the Alps

The recipients of basic premiums and environmental allowances must meet standards of Good Agricultural Practice in an Alpine context. Rules of Good Agricultural Practice that have been developed under lowland conditions are mostly irrelevant in the high mountains. Isolated solutions in the form of more or less randomly distributed contractual nature conservation areas from the Second Column do not reflect the complexity of Alpine cultural landscapes. Single elements of ecological performance records required for receiving Swiss direct payments could be integrated in this context.

Elements of a newly designed Good Agricultural Practice in the Alps may for example include:

16. Avoiding water pollution (in Alpine territory, slurry dispersion is particularly risky),
17. Avoiding eutrophication of Alpine habitats, particularly wetlands,
18. Respecting nationally enacted special biotopes, bogs, fens, mire landscapes,
19. Avoiding soil erosion and eutrophication damages close to crests as a consequence of insufficient shepherding and pasture management of mountain sheep (based on the Swiss regulations for summering premiums),
20. Keeping of exclusively genetically non-modified organisms and respective feed,
21. Adhering to officially declared local breeding and upbringing areas of grouses and other species that are sensitive to livestock grazing.

So far, Switzerland is the only Alpine country that has not only consistently registered Alpine bogs and wetlands, but has taken protective measures through cross-compliance. A comparable registry has been estab-

lished in most other Alpine regions (e.g. Bavaria, Austria, Trentino, Rhone-Alpes), however without officially demarcating swamplands with respective land use requirements.

2.2 Second Column

2.2.1 Result-orientated funding components in all Alpine countries

Result-orientated ecological payments are currently tested and thoroughly discussed in the plains, while their need is most obviously in high mountains. Mountain farmers or herdsman that contribute more to biodiversity, the ecosystem and natural hazard prevention for the valleys should also be compensated more. However, this postulates that bonuses are not only handed out for work performed such as fence-making, but under certain conditions also for measures not taken.

2.2.1.1 Species payments in high altitude pastures

Areas of particular biodiversity justify particular precautionary duties, even though lowland biotope management regulations should not simply be applied to comparably extensive alpine pastures with their different tenure and historic situation. As the bio-geographical location of an alp is geographically fixed, the existence of FFH directive Annex II species and habitats that require particular maintenance and care justifies a particular funding eligibility (cf. „priority areas in Annex I).

The programmes MEKA in Baden-Württemberg and ÖQV in Switzerland mark a certain change of paradigm. Not a particular measure or abstract area is being compensated, but rather a concrete ecological target condition. Grassland biodiversity respectively a vegetation status that has to be verified through indicator plants represents an „income asset“ and funding criteria. The feedback among farmers was surprisingly positive (cf. OPPERMAN & GUJER 2003). The mountain pasture competition („Bergwiesen-Wettbewerb“) for mountain farmers, advertised by the Naturschutzrat Vorarlberg (Nature Conservation Council Vorarlberg, AT), is raising awareness for what can be achieved in terms of biodiversity.

Nonetheless, deterministic approaches are not capable of containing overbording bureaucracy. Furthermore, they are in contradiction to the continuum-like character of mountain pasture habitats, which cannot be easily differentiated into defined categories. Thus, it is not enough to transfer existing national programmes for defined habitats („extensive alpine meadows“, „fenced bogs“, „extensive larch meadows“, „high-yield larch meadows“, „alpine dry grassland“, „conservation of natural springs“ etc.). A patchwork of maintenance efforts is not always doing justice to the overall character of an alp area, as it implies considerable bureaucratic and control efforts in times of public sector staff cuts, transforming farmers to applicants.

2.2.1.2 Climate protection incentives

Extensive grasslands with a positive carbon balance, or even better with fallows and creation of bogs, can substantially contribute to carbon storage. A large pasturing co-operative that is willing to tolerate comparably large dwarf shrub formations - capable of accumulating raw humus – and only occasionally clears to avoid reforestation, should receive a climate protection bonus that corresponds to the annual amount of carbon (carbon avoidance value) being stored in the heath.

This would close a funding gap. Currently, if „under-grazed“ or fallow alp areas are allowed to undergo natural succession, they will eventually be defined as forest areas, rendering them no longer eligible for funding (e.g. compensation allowances) and recultivation in the future. In order to avoid losses of income, mountain farmers are thus forced to remove shrub even if succession processes stabilise the local ecosystem.

This problem could be addressed if forest laws would no longer generally consider new groves as forest (requiring the limitation of officially defined mountain forest areas to existing forests and groves). Furthermore, water retention services and carbon storage (e.g. through humus accumulation of dwarf shrub formation or dwarf pines) should be eligible for funding just as other services of abiotic resource protection.

These modifications would most likely favour forest-related objectives, as mountain farmers would then be allowed to tolerate huger groves. Currently, numerous clearings are not based on high feed demand, but rather on the need to sustain the legal pasture area eligible for funding.

2.2.1.3 Risk prevention payments – Compensating instead of only demanding slope stability and hazard prevention services

Apart from currently grazed areas, large alps usually also feature considerable „areas with protective function“. The latter could be compared to areas of suspended cultivation, for which high bonuses are being paid

in the lowlands – even if maintenance efforts are no longer necessary since 2004. At the same time, high mountain fallows are much more effective in regard to the ecosystem, e.g. in the form of scrub encroachment that stabilises slopes or water-retaining dwarf scrub vegetation.

A first step in this direction represents the Tyrolean Flood Protection and Control Project Pertisau torrents (Pertisauer Wildbäche) (HELLEBART 2004). Instead of large-scale retention basins, a widening of the river bed, increased infiltration and sedimentation of bed load has been facilitated, affecting wood pastures and smaller extensive, wooded grazing areas of the Falzthurn and Gramai alp. Following an alpine flood event, this could have resulted in a decrease of pasturing area eligible for compensation. However, an acceptance among pasturing beneficiaries has been accomplished by providing additional pastures (each 0.5 to 1.0 ha) and by compensating restoration efforts following flood events. The value of natural succession on areas dominated by slope and snow-related processes (slides, snow creep, avalanches) for the national economy is indicated by the problems and costs related to man-made reforestation. On the basis of Rottau alp / Chiemgau (DE, 1050 m) and Fischbach alp / Vorkarwendel (DE, 1550 m) case studies, BAIER (2004) provides evidence for growth stagnation and insufficient growth of planted spruce.

2.2.2 Differentiation according to real handicap

Enormous differences in natural and infrastructural conditions are until today hardly reflected in compensation payments (apart from non-accessibility payments in some regions). Handicaps and varying yields based on local conditions, internal structures, maintenance performance, biological value of land and consequent land use adaptations are largely not taken into consideration in most regions. It is not doing justice to actual conditions if similar bonuses per hectare and herding payments are equally applied to a rationally managed high-yield montane alps and to extensive high-altitude alps with substantial conservation requirements and difficult terrain. Shepherds on non-alpine juniper shrubs and extensive grassland are subject to strict management directives, whereas on alps, a daily or merely weekly check entitles to similar management bonuses. Zonally differentiated management and maintenance, a more specific pasturing regime and the procurement of additional management funds are easier to realise in larger, well-managed pasturing units. What is already taking place in some areas should be compensated in all regions of the Alps: Handicaps due to non-accessibility of alps and longer herding distances, permanent shepherding (beyond „occasional,, shepherding and checks), conceptual, protection-oriented fine-tuning of management practices in valuable conservation areas.

A categorisation of alps according to ecological requirements would only be a one-time administrative effort.

2.2.3 Capacity building

In mountain agriculture, the ecological expertise of farm and herding staff is even more relevant than under lowland conditions. Investing in capacity building saves control and bureaucratic costs. The indispensable precondition for sustaining diverse alpine cultural landscapes is knowledge of its sensitivities and specific requirements on behalf of the respective staff. A capacity building programme for all Alpine regions is absolutely necessary.

2.2.4 Contractual nature conservation on high altitude pastures – Transferring the CAD-principle to all Alpine countries

With these proposed measures, isolated contracts regarding specific conservation areas and related control efforts are generally no longer necessary. Under high-altitude conditions, where the entire grazing area is generally made up of extensive pastures, so-called „extensive pasture programmes“ are not fully appropriate. Objectives of contractual nature conservation programmes can be achieved more consistently, effectively and cost-efficiently through modifications in the First Column (see above).

CAD (Contrats d’agriculture durable = Farm contracts for ecologically sustainable farming) have been successfully implemented in France. Essentially, the underlying idea is to register ecologically particularly valuable areas as a whole in a programme based on a grazing plan on alp farms and to attach financial incentives (+25%) to this package. A **specific promotion of large-scale pasturing co-operatives** would be particularly useful. It would reduce dependency on certain, fully developed huts, individual access roads threatened by increasing risks of landslides, floods and avalanches and would provide opportunities to effectively realise protection strategies in territories with wolf, bear and lynx populations.

2.2.5 Reducing bureaucracy, minimising controls

Discontinuing contractual nature conservation agreements renders the majority of external control measures obsolete. Verifying whether a measure has been carried out requires much more effort than verifying whether a roughly defined ecological condition has been achieved or not. **Carcass disposal** of livestock killed in an accident is an example for unnecessary bureaucratic and costly procedures. The expense and effort required is out of proportion compared to the possible ground water pollution and does not take into account how fast natural utilisation through scavengers takes places on the spot. Veterinary regulations are being violated anyway by the fact that only in rare cases these carcasses are transported to the valley (loss of sheep not due to wolf accounts for 5% of the summering population in France). The European Commission should address this issue in consultation with regional governments, particularly regarding the aspect of protection of vultures and predators.

2.2.6 Non-accessibility compensation

Compensations for access disadvantages should be increased and introduced in all regions. The lower access standards of farmland, the lower is its vulnerability against intense rain or snowfall or mudslides. In singular cases, the financial limits for maintenance and repair of long access roads has been reached.

2.2.7 High altitude dairy farming is not funding objective

As many intensification tendencies on high altitude pastures are related to alpine dairy farming, all direct and indirect subsidies that promote the expansion of dairy farming to higher altitudes should be critically evaluated (e.g. alp milk privileges elevation-related subsidies for milk transports).

2.2.8 Pasture-subsidies, alpine grazing premium

In regions that have discontinued alp bonuses respectively summering premiums, a reintroduction of these formerly broadly accepted payments should be considered in light of insufficient livestock on high pastures and lower alps. They should, however, be supplemented with elements of Good Agricultural Practice and Cross Compliance. Cross compliance of summering premiums includes consideration of animal welfare aspects when driving cattle up to the pastures (e.g. Nature Park Brenta/Trentino, Italy, where lowland species unfit for higher altitudes have been driven up) and compliance with management objectives regarding high natural value areas (HNV).

2.2.9 Regional marketing

Regional initiatives marketing Alpine farmers' produce deserve a more intensive promotion. Some of them fail to succeed due to insufficient and non-professional marketing. The EU should thus promote cross-border exchange of experience. Some examples of successful initiatives are listed in Annex II.

Epilogue

Traditional mountain agriculture will maintain its relevance as long as it manages to flexibly address new challenges. Historic alpine agriculture has paved the way as it reacted to crises and inherent necessities through ownership changes, reorganisations, new cooperations and pasturing co-operatives and by abandoning and re-establishing sites. It will be decisive whether farmers and their representative organisations manage to justify their particular funding eligibility through a new orientation based on ecological responsibility. The European Commission and national governments ought to provide substantial assistance.

Appendix

Appendix I Core areas of Alpine biodiversity

The above identified measures could be initiated earlier in particularly diverse areas, altitudes and mountain ranges. Examples for these „priority areas of biodiversity“

A	Maritime Alps – Alpi Marittime – Alpes Maritimes with the western Ligurian (FR/IT)
B	Cottian and Graian Alps with Gran Paradiso, Queyras, Pelvoux, Vanoise (FR/IT)
C	Diois (Drome-Foothills/FR)
D	Mont Ventoux (FR)
E	Vercors (FR)
F	Vaud Foothills – Vanil Noir, Alpes Vaudoises (CH)
G	Eastern Penninian Alps with Upper Valais – Alpi Pennine – Vallée du Rhone
H	Sottoceneri (CH/IT) , Sopraceneri (CH)
I	Orobian Alps with Grigne – Alpi Orobie (IT)
K	Alpstein – Churfirten (CH)
L	Engadine – Stilsfer Joch (CH/IT)
M	Brenta – Adamello – Monte Baldo – Alto Garda (IT)
N	Dolomiti Bellunesi (IT)
O	Karwendel – Upper Isar – Blauberge (AT/DE)
P	Lechtal and Lechtal Alps (AT)
Q	Allgäu Alps (DE/AT)
R	Dolomiti d’Ampezzo (IT)
S	Berchtesgaden Alps with Untersberg (DE/AT)
T	Upper Tauern (AT)
U	Carnic Alps/Alpi Carniche – Tagliamento – Julian Alps/Alpi Giulie/Julijske Alpe – Karawan- ken/Karavanke (AT/IT/SLO)
V	Koralpe (AT)
W	Upper Austrian-Northern Styrian Limestone Alps (AT)
X	Lower Tauern (AT)

Appendix II List of successful regional initiatives

Ambitious conservation approaches could possibly be easier realised in the context of regional marketing initiatives. Subsidiary approaches provide the opportunity to extend the eco-label for alp produce to the protection of habitats and species. Numerous examples include:

- Group Alпамore/CH (Re-establishment of derelict alps),
- Iniziativa Agriturismo Valle Varaita/Piemont/IT (Luigi Dematteis: Renovation of buildings, rock bottom of out-migration has been overcome; first newly built barn), direct marketing initiatives Sachrang-Prien and Hindelang-Hinterstein valley/DE,
- Arvieux in Queyras, Barcelonnette, Jausiers/ FR,
- 12 farmers markets around Grenoble and Albertville/FR, small co-operatives and direct marketing initiatives, regional eco-label,
- Consumer-Producer-Working Group KOPRA Vorarlberg/AT (180 mountain farmers operate according to organic farming criteria, 1050 members),
- Malga Brigolina/Monte Bondone and Malga Serollo/Val Giudicarie/IT (model alps for sustainable farming, also offering farm),
- Reactivation Ritord-community alp/Municipality of Planay/FR (after two decades of fallow, this last regional alp producing Beaufort cheese in the core area of the Vanoise National Park as well as three alp chapels located at the Termignon alp have been reconstructed in 1997 with an investment of 600.000 French Francs),
- Revitalisation of a pasturing system in overgrown alpine landscapes through the establishment of a non-sedentary sheep pasturing co-operative in Var and Isere/FR.

Appendix III Classification of high-nature-value farmland (HNV) in the Alps

Currently available (e.g. AT) are not giving due credit to actual differences in value of alpine grassland. A similar treatment of summering pasture (alp) and high nature value farmland for example would not be appropriate. Useful lessons can be drawn from the Lombard region/IT with its mapping of nutrient-poor pastures. A guideline is presented in chapter 2.6 of RINGLER (2009). Vegetation forms potentially representing HNV are listed following an easy mapping code according to the southern French-Italian classification of pasture vegetation.

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