

Topics for the discussion on 28th of April 2015 in the European Parliament

1. Territorial Principle

According to requirements of the European Commission the territorial principle applies to the granting of minimum pensions for land of bavarian farmers in Austria since 2015. This means more bureaucracy for Bavarian farmers cultivating Alpine pastures in Austria, since they have to apply twice and a significant disadvantage in comparison to their Bavarian colleagues who only have to farm land in Bavaria. For these few blatantly disadvantaged farmers in the mountainous regions, exceptions of the territorial principle which has only been valid since 2015 are urgently necessary.

2. Special rule for community-alps regarding the depression within the cooperative alps zone (AGZ)

Up until and including 2014 there was no depression for cooperative alps in terms of a compensatory allowance. A capping limit of 16'000 € was scheduled per individual farm. In 2015 Bavaria launched a depression of 25 % for an eligible area of 100 hectares based on specifications according to EU law and bilateral discussions with the European Commission concerning the planning of the Bavarian programme. The European Commission asked to also extend that rule to cooperative alps.

As laid down in Article 31 section 4 of the EU Regulation Nr 1305/2013 this special rule though is not applicable to Bavarian cooperative alps, as there is no national law in Germany which equates members of these cooperatives with individual farmers in terms of funding, economically and socially.

The application of this site-specific depression for individual farms would therefore only be possible if the farmers separated their portion of land from the cooperative and cultivated it independently together with their other land.

This approach though would generally question the traditional system of cooperative alps which is limited only to the Bavarian Alps and would in consequence lead to the abandonment of these areas that are very important for the cultural landscape and the biodiversity.

Cooperative alps consist basically of small-scale and very small-scale farmers. The high efforts and costs for cultivation can only be beard in community. Since cultivation is almost exclusively done by handiwork, there is no so-called economies of scale which would justify a depression.

Hence it is suggested to add following rule to Article 31 section 4 in a new point c:

c) "... alpine areas approved and brought in by members will be farmed statutorily via communal business."

In the event of unions of smallest-scale farms, which can only be cultivated communally, the possibility of a special site-specific regulation of depression at the level of a merger could be created alternatively.

3. Predators

According tho the FFH Directive, Germany is disadvantaged in terms of its possibilities of fighting predators in comparison to other European countries such as Poland and the Baltic states for example who are entitled to practicable exceptions. This discrimination endangers the pastoral farming in mountainous regions because methods of herd protection do not work here (big open pastures, many tourists, sportsmen and people seeking rest and relaxation). In order to maintain the cultivation of mountainous regions, farmers depend on pastoral farming. This can lead to unacceptable structural changes especially when wolves appear. Meanwhile even in Germany the wolf is de facto no longer a species worth of protection. In the meantime the number of wolves has increased to 300 animals with a strongly upward tendency. Germany's biggest open pastures with extensive farming are located in the Alpine regions with its livestock in acute risk of predators.

4. Nitrate Directive

With regard to the mountainous regions with its special surface design and with its steep and uneven pastoral areas it has to be refrained from specific guidelines for the technique of manuring since special dunging machines can not be used there. Furthermore a practicable derogation law is needed soon for very fertile pastoral sites. It should be refrained from the demanded recording of a manuring plan for pastoral farms ranging up to 30 hectares. The general demand for a fixed floor panel for solid dung also overstrains small-scale animal keeping farms (costs, need for space at the hillside, etc.).

5. Tethered housing for cows

Tethered housing in combination with pastoral farming presents a very species-appropriate husbandry. The cattle spends over six months in the fields. Without this sort of husbandry cattle farming in mountainous regions together with the benefits that come with it such as keeping the landscape open, maintaining the biodiversity or the attraction of the alpine regions for the tourism would be in danger.

6. Mountain Products

At the moment the use of the optional quality description “Product of the Mountain/Produkt vom Berg” is obstructed by non-feasible controls regarding the restriction on feeding. The upper limits in terms of food rations for ruminants provided for by the Delegated Regulation 665/2014 of the Regulation (EU) 1151/2012 are too restrictive and have no regards for the special needs of mountain farming. Besides a flexibilisation of product guidelines starting points could be the mandatory participation in agricultural-ecological schemes or the certification of groups for example.

We are well aware that topics 3. Predators and 4. Nitrate Directive are not the department of the Commissioner for Agriculture. We would still highly appreciate, that the Commissioner for Agriculture supports concerns which are very important to the mountain farmers.