



25-8-2022

POLICY ADVOCACY FOR WETLAND MANAGEMENT IN SPAIN: PROPOSALS AND SUBMISSIONS TO THE SPANISH CAP

Fundación Global Nature
EUROPEAN LIVING LAKES ASOCIACION

Index

1. AGRI-ENVIRONMENTAL MEASURES AND FEADER FUNDS IN THE PEPAC FRAMEWORK 2023-2027	2
INTRODUCCTION.....	2
AGRI-ENVIRONMENTAL MEASURES	4
IMPROVEMENTS RESULTING FROM THE IMPLEMENTATION OF THESE MEASURES	9
2. BCAM AND WETLAND PROTECTION	10
3. ECO-REGIMES FOR WETLAND PLANTING AND PALUDICULTURE.....	12

Fundación Global Nature (FGN) has carried out a series of advocacy actions in reference to the protection of wetlands and their relationship with the various governmental instruments of compensation and aid to agriculture dealt with by the Spanish CAP (Common Agricultural Policy), both at the level of agri-environmental aid applicable in the Rural Development Plans (PDR), as well as the BCAM (Good Agricultural and Environmental Conditions) and eco-schemes. These range from proposals to allegations made to the competent government and administration bodies.

1. AGRI-ENVIRONMENTAL MEASURES AND FEADER FUNDS IN THE PEPAC FRAMEWORK 2023–2027

INTRODUCCION

Fundación Global Nature prepared and presented in autumn 2021 a document proposing agri-environmental measures for vegetation, soil and water management in wetland environments to be applied in rural development plans of the CAP post-2020 (PEPAC) in the context of the objective of the CAP Post 2020, which establishes that **40% of its budget should be allocated to environmental and climate objectives, including management measures in Natura 2000 Network areas**. For this reason, the FGN proposes agri-environmental measures applicable in the PDRs of the different Autonomous Communities whose implementation is expected for the period 2023 - 2027.

At a time when the impacts of intensive agriculture converge in the territory with problems such as aridity, drought, erosion, pollution of aquatic ecosystems (leached sediments due to erosion, nitrates and phosphates), forest fires and inadequate use of water, it is essential to promote measures that make conservation and use compatible, and the funds for their development can come from the aforementioned Rural Development Plans.

The Green Architecture of the CAP post-2020 poses important challenges to mitigate the negative impacts of agricultural production and to enhance the positive ones derived from more traditional, extensive farming and livestock management models, which have had a clearly positive impact and have for centuries shaped a landscape of undoubted quality.

In this document, proposals for agri-environmental measures focused on the **management of wetland vegetation, soil and water** were collected, and their implementation could be a pilot exercise to understand how to manage the territory at landscape scale through sustainable agriculture and livestock models, respectful of biodiversity and allied to climate change mitigation in

the working areas. As well as favouring employment and local development in these agricultural environments of High Natural Value.

It is based on the management of wetlands as they constitute a strategic ecosystem at national level. Wetlands provide key services to society:

- **Human health and sustainable livelihoods:** The ability of wetlands to filter and supply freshwater is perhaps the most important service affecting the health of urban, rural and coastal communities around the world.
- **Water, food and energy security:** In many countries, water, food and energy security depends, in large part, on the functioning of wetlands and is a necessary condition for economic development and poverty alleviation. And it is threatened by the same unsustainable uses and pressures that negatively affect fisheries, agriculture, water supply and treatment, and the hydropower and transport sectors.
- **Resilience of social-ecological systems:** the protection and restoration of wetlands should be a key element in national and global climate change mitigation and adaptation strategies. Restoring degraded wetlands increases the adaptive and adjustment capacity of these ecosystems and the communities that depend on them to cope with the impacts of extreme events and other disturbances, such as floods, droughts or sea-level rise, which are therefore critical to the health and sustainability of social-ecological systems.
- **Carbon sinks:** restoring degraded natural areas is one of the tools to mitigate climate change, as ecosystems in better condition are good sinks for greenhouse gases, with wetlands leading the way. The scientific community has proclaimed habitat enhancement and restoration as one of the most important measures to mitigate the future effects of climate change on habitats and species.

And **biodiversity** underpins their functioning and the production of "services" such as these, including **provisioning services** (food, fibre, fuel and water), regulating services (climate, flood, disease, waste and water quality), **cultural services** (recreation, aesthetic enjoyment, tourism, spiritual and ethical values), and supporting services necessary for the production of the rest of the ecosystem services (soil formation, photosynthesis and nutrient recycling). Analyses indicate that restoration activities that enhance biodiversity are positively correlated with increased ecosystem service provision.

AGRI-ENVIRONMENTAL MEASURES

The main objective of this proposal was the protection of wetlands, their biodiversity and carbon-rich soils, as this type of ecosystem represents an important carbon sink and is therefore relevant in the current legislative framework for climate mitigation and adaptation.

To this end, it is expected that in the coming years the Spanish Ministry of Agriculture, Fisheries and Food will develop the new SIGPAC layer of wetlands and the around lagoon areas plots in agricultural environments and define the good environmental practices required under enhanced cross-compliance. Once the levels of protection and permitted agricultural practices have been defined, a new production and conservation model based on carbon recovery in soils and water and on support for biodiversity as a fundamental element for agricultural activity can be proposed.

It was assumed beforehand that these commitments must always go beyond the minimum required in the good farming practice benchmarks of enhanced cross-compliance. Following this, **Concrete measures should be taken to achieve these objectives, for which the following catalogue of measures is proposed**, which are proposals derived from the results obtained in European projects: [LIFE Paludicola](#), [LIFE Wetlands4Climate](#), [LIFE Humedales de la Mancha](#), [LIFE Estepas de la Mancha](#) and other experiences accumulated after almost 30 years of work in wetland management.

The aforementioned measures, which should be made clear, have been proposed for the Mediterranean wetlands of the Spanish territory due to the particular characteristics and idiosyncrasies of this type of ecosystems present in ecological, climatic and social characteristics different from other wetlands and peatlands found in other regions of Europe. Moreover, not all the measures are applicable in all the Autonomous Communities of Spain, as each type of wetland requires and/or makes possible different types of interventions. The proposed measures are the following ones:



Measure	PREMIUMS	Description
Measure 1: Extensification of agricultural production in wetlands		
1.1.- Agreements for traditional wetland mowing.	Basic premium: 54,09 €/ha	Mowing of marsh vegetation with tractor, sickle or amphibious machine. Removal and recovery of by-products.
1.2.- Plant regeneration and plantations in wetlands.	Basic premium with spontaneous cover: €150/ha	Regeneration of the wetland vegetation fringe and/or planting of aquatic or terrestrial vegetation.
1.3.- Agricultural extensification and irrigation water saving.	I. 50% reduction of the endowment. Max. consumption: 2,100 m ³ /ha/year Basic premium of 209 €/ha. II. 100% reduction of the endowment. Basic premium of 518 €/ha.	Reduction of irrigation and/or extensification of production, requiring water consumption savings of at least 50%.
Measure 2: Extensification of livestock production in wetlands		
2.1.- Extensive grazing agreements in wetlands for the improvement and conservation of the environment.	Basic premium: 40,27 €/ha + 20 % incentive (8,05 €/ha) in case of grassland and stubble and different supplementary premiums.	Agreements with farmers with limited livestock units or requirements (e.g. grazing infrastructure) to control stocking pressure, ensuring that it is extensive, low or moderate.

Measure	PREMIUMS	Description
Measure 2: Extensification of livestock production in wetlands		
2.2.- Sustainable management of forage areas for grazing and support for traditional transhumant grazing systems.	Basic premium: €35.00/ha of forage area. + 20 % incentive (€42/ha in total) in the case of transhumant livestock farming practices. + 30 % incentive (€52.50/ha in total) if the animals are moved on foot.	Extensification of livestock farming by being absent from the grazing farm for at least 4 months, with physical movement of the livestock. This will contribute to improve the use of the land, achieving the recovery of the soil and its floristic diversity both on the farm of origin and on the receiving farm.
Measure 3: Protection of water resources and paludiculture		
3.1.- Restoration of water points and water management.	Basic premium: 5.000 €/ha	Restoration of channels, ditches and streams by cleaning, clearing, removal of motes, and management of flood levels by specific measures, e.g. in coastal wetlands with mudflats / opening of channels.
3.2.- Opening of new water points.	Basic premium: 2.000 €/ha	Creation of new water points, such as ponds and small wetlands, water retention infrastructures or temporary ponding and flooding of existing ones in poor condition
3.3.- Abandonment of farmland for conversion into part of a wetland.	Basic premium for extensive crops: 275 €/ha Basic premium intensive crops: 600 €/ha	Recovery of unprofitable areas and compensation for loss of agricultural activity in buffer zones to protect water quality around the wetland.

Measure	PREMIUMS	Description
Measure 3: Protection of water resources and paludiculture		
3.4.- Paludiculture applied to the reconversion of cropland to wetland waterlogged crops.	Basic premium: 8.000 €/ha (5 years)	Winter staking of crops, planting of marsh vegetation, and harvesting by mowing, or grazing of low to moderate stocking rates.
3.5.- Paludiculture applied to the conversion of farmland into permanent wetlands.	Basic premium: 13.000 €/ha (5 years)	Creation of wet pastures, and utilisation with different livestock species through waterlogging cycles and sowing of grass seeds, and creation of hay meadows.
Measure 4: Wildlife protection in wetlands		
4.1.- Payment for damage caused by fauna in crop fields.	Basic premium: 68 €/ha	Financial compensation for damage caused by wildlife to agricultural production, especially birds associated with the wetland environment such as steppe birds, thus creating feeding areas.
4.2.- Stop agricultural activities in wildlife breeding windows.	Basic premium: 104.57 €/ha	Payment for loss of income due to cessation of tillage, sowing, or other agricultural work in critical periods for certain species.
4.3.- Actions to improve the habitat for feeding and sheltering steppe birds.	Basic premium: 139.43 €/ha and supplementary premiums	Rotation of herbaceous crops with legumes, promotion of seeded fallow land, over-sowing by increasing the seed dose to cover the double objective of production and feeding steppe birds.

Measure	PREMIUMS	Description
Measure 4: Wildlife protection in wetlands		
<p>4.4.- Actions on rice fields for the conservation of species. <i>Coastal wetlands only</i></p>	Basic premium: 397.63 €/ha	<p>Maintenance of rice cultivation for at least five years, without reducing its surface area, improvement of water quality by reducing the use of chemical products, reduction of nitrogen fertilisation by at least 20% with limitations per ha, biological treatment of pests, and management of stubble without burning and making the most of the straw. Management of water infrastructures and reduction of herbicide use.</p>
<p>4.5.- Payment for installation and maintenance of wildlife sanctuary infrastructures</p>	Basic premium: 150 €/ha	<p>Financial compensation for the installation of elements that serve as a refuge for wildlife and are an active element in the biological control of pests and diseases.</p>
Measure 5: Landscape protection		
<p>5.1.- Recovery of agricultural environments of high landscape value, favourable to the maintenance of the biodiversity of flora and fauna.</p>	Basic premium: 138,23 €/ha	<p>Conservation of vegetation cover, hedges and copses, natural vegetation, isolated trees or shrubs and islets of brambles or bushes, maintenance and reconstruction of traditional stone fences and walls which will be checked and repaired annually, etc.</p>

IMPROVEMENTS RESULTING FROM THE IMPLEMENTATION OF THESE MEASURES

Wetlands and agricultural activity **converge in the territory** and share fundamental scarce resources: **water and soil**. And around this shared space there are numerous **species and habitats** that depend on the quality of these environments, species that in turn are allies of agricultural activity.

The coordinated efforts of the Spanish Ministry for Ecological Transition and the Demographic Challenge, the Spanish Ministry of Agriculture, Fisheries and Food and the country's Autonomous Communities in the field of wetland conservation are an ideal framework to contribute to the fulfilment of European agricultural objectives for Spain in the new programming period, as well as those of climate change, biodiversity conservation and the good management of the agri-food chain, from farm to fork.

The pressures to which wetlands have been subjected are associated with land use and human activity in their areas of influence. Agriculture is the most water-intensive sector and generates problems such as eutrophication, salinization, erosion and desertification, chemical pollution and toxicity, changes in natural receiving environments and greenhouse emissions. Agricultural activity is also a driver of biodiversity loss, although if well managed it is fundamental for land conservation, as can be seen in the High Nature Value Systems, systems included in the CAP, as **they make high quality production compatible with the maintenance of a high level of environmental services and biodiversity**.

There are new opportunities for employment and income generation based on this proposed green economy in the wetland environment. The social gain is also linked to the demographic challenge of securing employment in rural areas, and enhancing local and regional recreation and tourism, as well as the identity and preservation of the associated cultural heritage.

The measures include circular economy designs and close the cycle of the extracted material by encouraging its use locally through composting.

The document presented includes a summary of possible agri-environmental measures tested in the field in previous FGN work in the territory or other projects. Measures that we know could work, focused on vegetation and soil management of wetlands and their surroundings, and we believe that their implementation could be a pilot exercise to understand how to manage the territory at landscape scale through sustainable agriculture and livestock models, respectful of biodiversity and allied to climate change mitigation in the working areas.

The full report was sent to the communities where FGN works in the wetland environment: Castilla La Mancha, Castilla y León and Comunidad Valenciana, as well as to the Spanish Ministry for Ecological Transition and the Demographic Challenge and the Spanish Ministry of Agriculture, Fisheries and Food. Continuing with the exchange of information regarding the reform of the CAP, and with the aim that, knowing that the different Autonomous Communities are currently working on the development of possible agri-environmental measures to be included in the PEPAC for the next programming period, these can serve as a series of recommendations for their assessment to be included in these agri-environmental measures.

2. BCAM AND WETLAND PROTECTION

BCAM is a measure of good agricultural and environmental practice under CAP enhanced cross-compliance. And the CAP reform is a good opportunity to promote the conservation and restoration of wetlands. Therefore, of particular interest is the definition of Good Farming Practices to be promoted from 2025 onwards in agricultural areas close to wetlands: national and regional competent authorities must ensure that " BCAM 2: Minimum appropriate protection of wetlands and peatlands (by 2024 at the latest)" is correctly implemented. The protection of wetlands is therefore foreseen for the first time in CAP cross-compliance. Moreover, this was to be implemented from 2025, but has finally been brought forward to 2024.

This BCAM is a great step forward, although its potential depends on the zoning to be established in the SIGPAC layer. The FGN proposes that the national authorities begin to delimit the zoning as soon as possible and that in its development they include all the around lagoon areas plots in which commitments to permanence and economic compensation should be established, either through agri-environmental measures such as those proposed in this document or through Eco-schemes in the wetland environment.

In addition, this BCAM 2, the full text of which can be found on the website of the Spanish Ministry of Agriculture, Fisheries and Food (https://www.mapa.gob.es/es/pac/post-2020/pepac-enviado_tcm30-623871.pdf), provides a summary of the possible practices that may occur on such farms.

One of its points, 3.10.1.2.5., states in the explanation of the contribution to the main objective of the BCAM standard that in order to achieve the objective pursued by the BCAM on the conservation of the carbon content of these soils: - No clearing may be carried out in wetlands and peatlands for agricultural purposes on the

areas indicated in the corresponding SIGPAC layer according to the works described in section 3.3. 10.1.2.3, with the exception of those areas linked to the traditional cultivation of rice (paddy fields), given that such cultivation contributes to the protection and maintenance of wetlands and the biodiversity associated with them. Areas under traditional rice cultivation shall mean areas sown with rice in any of the years 2018, 2019 and 2020 according to the corresponding SIGPAC layer. EN 403 EN - An agricultural activity linked to grazing may be maintained, so that such land may continue to be considered as agricultural land, and a maximum stocking rate of one livestock unit (LU) per hectare must be established.

FGN believes that the proposed text "No clearing of wetlands and peatlands for agricultural purposes..." is ambiguous and penalises Mediterranean wetland management actions such as clearing of helophytic vegetation, whose biomass removed can be used for agricultural purposes. This management tool is key to preserving biodiversity and improving carbon sequestration in wetlands and peatlands. Nor is there any reference to other ecological infrastructures or the around lagoon areas, whose sustainable management is essential in maintaining the ecological functionality of wetlands. Therefore, we have issued a series of allegations to the report of the observations issued in the hearing and public information of the draft Royal Decree establishing the rules for the application of enhanced cross-compliance and social cross-compliance to be complied with by beneficiaries of aid receiving direct payments, certain annual rural development payments and the POSEI programme, in response to this document. Where we request that the text should specify after "... " instead of "for agricultural purposes" in order to establish new agricultural crops, with mowing carried out for the purpose of regeneration of marsh vegetation being permitted".

The justification for this is that the action of mowing or clearing of helophyte vegetation in wetland environments, carried out in a traditional manner and taking into account ecological factors of these ecosystems, is an action that seeks to reduce eutrophication and clogging of wetlands by removing plant biomass and thus allowing the regeneration of submerged aquatic flora, very important as the basis of the trophic chain of wetlands. By-products obtained from mowing can be bagged or removed for use as livestock fodder, as fertile cover for spreading on nearby cultivation plots, or for shredding and making organic compost and/or peat in a way that promotes the circular economy. In addition, explicit mention should be made of the prohibition of draining and draining wetlands for agricultural purposes. The FGN requests that all the around lagoon areas plots be included in this zoning. In the around lagoon areas strips of wetlands defined in the SIGPAC

layer, erosion and leachate should be avoided by: permanent soil cover in the case of woody crops, to avoid laminar erosion and therefore the clogging of wetlands, as well as the leaching of nutrients and agrochemicals, the establishment of a buffer strip with natural vegetation with a width of more than 5 metres on boundaries. This measure would be compulsory for non-woody crops. It is proposed that buffer strips in wetlands and peatlands, due to the ecosystem services they generate, should be considered as productive areas and therefore eligible for inclusion in the area declared for the basic payment.

3. ECO-REGIMES FOR WETLAND PLANTING AND PALUDICULTURE

In addition, the FGN has submitted allegations to the report on the observations issued in the hearing and public information on the draft Royal Decree on the application, from 2023, of interventions in the form of direct payments and the establishment of common requirements in the framework of the Strategic Plan of the Common Agricultural Policy, and the regulation of the single application of the integrated management and control system, also referring to the protection of wetlands in Spain.

We have noted (in Article 44 and Annex XIII of the document) that biodiversity sites do not include restored wetlands, so we have proposed alternatively to extend the definition of biodiversity sites to include areas of restored wetlands, understood as plantings of helophyte or hydrophyte species (3 plants m², > of 3 different species), areas of sustainable mowing or restoration interventions of local wetland vegetation. These areas will be included in the list of biodiversity areas under the figure of biodiversity margins or islands or landscape elements.

Also (in article 45 of the document) that the document (the actions mentioned in point 2) does not guarantee a positive impact on biodiversity or the maintenance of wetlands. The maintenance of the water sheet benefits biodiversity regardless of whether there is cultivation or not. And we have proposed that the use of phytosanitary products should be limited to thresholds to be determined by the competent authorities in the management of each wetland, based on the use of seeds that do not contain phytosanitary products or with toxicological category AAA or AAB. The intermittent drying measure should not be rewarded as an eco-regime and should be transferred to the relevant GAEC. That grazing should be included as part of the practices rewarded under this eco-regime. That, in low-water crops, nitrogen fertilisation should be reduced by at least 20% of the current baseline. And that, in any case, maximum nitrogen fertilisation inputs may not exceed: Bomba-type variety 7.5 kg of pure N per ha; other Japonica-type varieties

15 kg of pure N per ha. At the same time, this eco-regime of Article 45, which has been designed for the cultivation of rice fields, does not take into account other possibilities of waterlogged crops. For which we have proposed to include in this eco-regime the possibility of "paludiculture", which allows the restoration of formerly drained wetland areas for arable crops. The steps for paludiculture farming would be as follows:

1. The first step is to remove excess nutrient levels by grazing for at least 2-3 years, using sheep or goats. Prior to waterlogging
2. The area to be grazed must be located in wetlands in RN2000 zones, catalogued in the RAMSAR list or defined in the SIGPAC layer of wetlands in Spain. The area to be grazed should be in the vicinity of the wetland.
3. After 2-3 years of grazing, the cropland would be waterlogged. Taking water from water channels and main drains during the winter, and retaining it for the months that it will hold (avoiding permanent flooding). This operation would then be repeated in the following winters.
4. After this, grazing should be continued once the water level has risen, in wet pastures.
5. From the 3rd or 4th year onwards, planting of plant species typical of marshy environments, bulrushes or cattails (*Typha* genus), which may be mown for agricultural or livestock purposes (fodder, bedding, or soil structuring).
6. Management of planted vegetation by partial removal of vegetation through traditional mowing or grazing at low to moderate stocking rates annually, so that organic matter does not accumulate in the wetland.