

To: Executive Vice President Frans Timmermans
Berlaymont, Rue de la Loi 200
1000 - Brussels

Commissioner Janusz Wojciechowski,

Commissioner Virginijus Sinkevičius

12 May 2021

Re: Open letter on Peatlands and Paludiculture in future CAP

Dear Executive Vice President Frans Timmermans,

Dear Commissioner Janusz Wojciechowski,

Dear Commissioner Virginijus Sinkevičius,

We, a broad network of conservationists, scientists and farmers caring for wetlands and peatlands across the EU, are writing to you to raise our concerns concerning the insufficient protection of peatlands in the post-2022 Common Agricultural Policy (CAP). Action is urgently needed to restore degraded peatlands used for agriculture and to develop and promote sustainable land-use on rewetted peatlands. The current draft decisions on CAP will fail to turn agriculturally used drained peatlands from a disproportionately large source of greenhouse gas emissions and biodiversity loss into low-emission, biodiversity-rich land and potential carbon sinks - in direct contradiction with the EU Green Deal; in particular the EU's Biodiversity Strategy, climate policies, and Farm to Fork Strategy.

Therefore, we urge you to champion at the very least the following changes in the ongoing CAP trilogue negotiations:

1. **"GAEC 2" of the CAP Conditionality on the protection of wetlands and peatlands must be tightened to deliver real improvements** in agriculturally used peatlands over the duration of the new CAP. A new footnote should set unambiguous minimum criteria for the application of this GAEC, which must as a minimum stop the further degradation of drained peatlands and not just consolidate the unacceptable status quo¹.
2. **Paludiculture, i.e. agriculture on wet or rewetted peatlands, must be fully and unconditionally eligible for direct payments** as an 'agricultural activity' and 'agricultural area' (Article 4 of the draft CAP Strategic Plans regulation). No landowner in the EU should be economically or socially disadvantaged by maintaining or developing wet peatlands by rewetting peatlands²

In addition, national CAP Strategic Plans should incentivise productive agricultural use of wet peatlands (paludiculture) in order to minimise greenhouse gas emissions, maximise carbon

¹ [Ausgestaltung der Konditionalität in der nächsten GAP-Förderperiode: GLÖZ 2 „Angemessener Schutz von Feuchtgebieten und Torfflächen“](#)

² [PEATLANDS IN THE EU. COMMON AGRICULTURE POLICY \(CAP\) AFTER 2020 Policy Brief, March 2020 Wetlands International, Greifswald Mire Centre, National University of Ireland, Galway](#)

storage, enhance biodiversity and reduce land subsidence. This is critical to meet the EU's biodiversity and climate objectives for 2030, and we count on the Commission to pay particular attention to this in the upcoming approval process.

Fully functional, healthy peatlands are the most space efficient long-term carbon store and sink in our planet's biosphere, but when they are drained and degraded for agriculture, forestry and energy, they release huge amounts of CO₂ emissions. Globally the EU is the second largest emitter of greenhouse gases (GHG) from drained peatlands (220 Mt CO₂eq/year = ~15% of total global peatland emissions = ~5% of total EU GHG emissions). **Shifting to paludiculture is the biggest carbon farming game-changer as it is key for a bio-based circular economy providing multiple wins for farmers' incomes, climate, biodiversity, and water.** By rewetting just 3% of the EU agricultural land, the EU can cut up to 25% of emissions from EU agriculture and agricultural land use contributed by drained peatlands (see info graph attached to this letter).

While the latest proposals discussed in trilogues fall short of the required step change, there is still time to achieve these most urgent changes in the new CAP. **We urge you to defend the success of the EU Green Deal in CAP trilogues, especially with an ambitious Conditionality mandatory for all Member States. This is absolutely key to ensure future policy coherence and long-term planning reliability for all parties involved.**

Yours sincerely,



*Jan Peters, Managing Director of the Michael Succow Foundation as corresponding author and
Leading representatives of the following organisations and projects:*

Greifswald Mire Centre (Greifswald University, Michael Succow Foundation and DUENE e.V.)

Wetlands International European Association

European Environmental Bureau

BirdLife Europe

National University of Ireland Galway

Natural Resources Institute Finland LUKE

Estonian Fund For Nature

Foundation for Peatlands Restoration and Conservation Lithuania

Baltic Environmental Forum Lithuania

Lithuanian Fund For Nature

Environmental Coalition Lithuania

Wetlands Conservation Centre Poland (CMok)

Polish Society for the Protection of Birds (OTOP)

Deutscher Verband für Landschaftspflege (DVL)

WetlandProducts



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Rewetting just X% of agricultural land will reduce agricultural greenhouse gas emissions by up to Y%

