Report on implementability of agro-environmental targets in Lithuania

BALTIC COMPASS WP 6

Baltic Sea Region Programme

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Introduction

The purpose of the report is to explore the agri-environmental policies in Lithuania, based on the following guiding questions: Are the agro-environmental policy targets set appropriately?; Do they reflect the needs of environmental stakeholders?; Is the policy implementation impact monitored properly?; and, Is the impact visible and appropriate?.

The current assessment is based on the Lithuanian Rural Development Programme 2007-2013, its implementation programmes and measures concerning agro-environmental measures, and Lithuanian policies and legislation on implementation of the EU Water Framework Directive.

Methodology

The report is focused on a systemic level of analysis. At this level capacity constraints were assessed at the overall policy and legal framework level, and aspects of institutional setup, and available financial resources were also targeted.

The following methods were undertaken in developing the report:

Existing information analysis comprising of a desktop review of the latest national documentation and institutional databases. Internet resources were also used. Here, the linkages between Lithuanian national legislation and EU agri-environmental targets were assessed.

Consultations with stakeholders were done frequently to ensure the quality of the report and to ensure all capacity constraints are addressed and considered.

Individual interviews and consultations were conducted, focusing on expert institutions in the sectors related to the ministries of agriculture and environment, as well as with related public servants. Experts representing various interest groups were also approached.

National agri-environmental targets

There are three main national strategies in Lithuania: the National Development Strategy, a national long-term economic development strategy (to 2015) and the National Sustainable Development Strategy. These strategies form a baseline for all other strategic policy documents, which must be coordinated and inline with these main strategies.

Considering aspects related to agri-environmental policy in these three strategic documents, it can be concluded that agri-environmental policy is not reflected in the major policy strategies. Agrienvironmental policy can be considered a cross-sectoral issue, integrating economic and environmental aspects in agriculture. Such integration in the above-mentioned strategic documents (including in the sustainable development strategy) is missing. While water, soil, and environmental quality issues are described in the environmental chapter, ecological farming, infrastructure development and increased competitiveness for the agriculture sector are reflected in a separate chapter for agriculture.

The sustainable Development Strategy contains very limited mention of the agriculture sector, mainly highlighting the necessity of pollution reduction. Such a view, recognising agriculture as an obstacle to good environmental status, is rather narrow since it does not recognise, for example, agriculture as an important sector in terms of addressing fragmented landscapes and maintaining extensive farming practices, which are vital for favourable biodiversity conditions. At the same time, the National long-term economic development strategy recognising the integration of environment and agriculture is limited to the extent of promoting ecological farming, and which is understood not





as a tool for increasing environmental quality in the area, but rather as a measure addressing healthand food-safety aspects. Missing integration between agriculture and environment sectors in basic policy strategies, is probably one of the root-causes explaining the current lack of institutional cooperation between the Ministries of Environment and Agriculture, as well as challenges arising while implementing agri-environmental measures.

The definition of agri-environmental measure is included in the National Rural Development Programme, and since integration into the European Union in 2004 Lithuania has implemented the second period of this programme. This report will focus on the programme for the period of 2007-2013.

The objective of the Rural Development Plan's 2007-2013 Measure 1: 'AGRI-ENVIRONMENT PAYMENTS' is to ensure sustainable development of the countryside, and to create and preserve a healthy and harmonious living environment for people, natural landscape elements and for overall ecological stability. These are to be reached through the following specific objectives: "preserving the landscape, biodiversity and semi-natural habitats" and "reducing the negative impact of agricultural activities on the environment"¹.

Operational objectives of the measure are:

- to preserve and to duly maintain natural and semi-natural meadows and wetlands, when necessary, restoring extensive farming systems in them, to reduce the intensity of farming on intensively-used meadows;
- to reduce water pollution from nutrients from intensive arable farming activities;
- to reduce soil erosion that occurs because of inappropriate arable land cultivation;
- to contribute to mitigating climate change;
- to promote organic farming as a production system that offers social and economic benefits to rural residents, ensures environmental protection and the production of quality foodstuffs that are in great demand on the market;
- to help attain the 'good condition', as defined under the Water Law, in water bodies that by virtue of negative effect of farming are classified as 'bodies at risk' and where it is likely good condition may not be attained by 2015.

This measure consists of the following schemes:

- Landscape stewardship scheme:
 - Activity 1 management of natural and semi-natural meadows;
 - Activity 2 management of wetlands;
 - Activity 3 management of shore protective belts of water bodies in meadows;
 - Activity 4 protection of water bodies against pollution and soil erosion on arable land;
 - Activity 5 stubbly field in winter season;
 - Activity 6 strips or plots of melliferous plants on arable land;
 - Activity 7 management of the holding landscape elements;
 - Activity 8 management of reclamation ditches,
- Organic farming scheme,
- Rare Breeds Scheme,
- Scheme for improving the status of water bodies at risk; and,
- Natura 2000 payments and payments linked to Directive 2000/60/EC.

This report does not evaluate the scheme "Rare breeds" since it doesn't have a direct impact on Agrienvironmental measures.

The key requirements for farming within the Measure mentioned above are:



¹ Rural Development Programme for Lithuania 2007 – 2013, p. 53

- grass cutting from July 15th to September 30th,
- biomass should be removed from the fields,
- regulating the density of cattle for pasturage.
- For the Activities 'Management of shore protective belts of water bodies in meadows' and 'Protection of water bodies against pollution and soil erosion on the arable land' fertilizers and pesticides are not allowed to be used.

Other specific requirements:

Within the activity 'Stubbly field in winter season' the applicant should after harvest time leave straws tied up in parcels or chopped, must not use fertilizers, pesticides, and herbicides, and must not put cattle out to pasture.

Within the Activity 'Strips or plots of melliferous plants on arable land' farmers with big, arable fields should in every 10 ha introduce strops or plots up to 0,5 ha of melliferous plants, consisting of at least 3 kinds of melliferous plants and must maintain them in a proper way (cut up to 10 cm height, pasture cattle from September 15th etc.).

Within the Activity "Management of the holding landscape elements" describes requirements for developing and maintaining hedges, with strict regulation hedges must not be cut within the bird breeding period (March 1^{st} to July 31^{st}).

Requirements within the "Organic farming scheme" applicants should engage in the agricultural production of agricultural produce and production has to apply EU and National regulations on ecological products.

Requirements within the "Scheme for improving the status of water bodies at risk", the applicant, holding at least 1 ha of arable land at the area of water bodies at risk, should till July 1st sow perennial meadow seeds. Once the meadow is set up the applicant should cut the grass and remove biomass 1st grass by August 1st, second mowing – by September 30th.

Requirements within 'Natura 2000 payments and payments linked to Directive 2000/60/EC' the applicant should hold at least 1 ha land at Natura 2000 sites, and the quality of holding crops and meadows should correspond to good agricultural status.





Financial allocations:

Axes	Measure	Measure title	Total Public Expenditure	
			Value, EUR	Share, %
1	111	Vocational training and information actions	16.539.999	0,7%
	112	Setting up of young farmers	62.240.000	2,8%
	113	Early retirement	167.149.779	7,4%
	114	Use of advisory services	36.419.999	1,6%
	121	Modernisation of agricultural holdings	401.298.847	17,8%
	122	Improvement of the economic value of forests	20.500.000	0,9%
	123	Adding value to agricultural and forestry products	137.498.487	6,1%
	125	Infrastructure related to the development and adaptation	58.660.000	2,6%
	141	Semi-subsistence farming	29.890.000	1,3%
Total Axis 1			930.197.109	41,2%
2	212	Payments to farmers in areas with h. other than mountain areas	287.033.696	12,7%
	213	Natura 2000 payments and payments linked to Directive 2000/60/EC	7.500.000	0,3%
	214	Agri-environment payments	364.916.304	16,1%
	221	First afforestation of agricultural land	59.214.489	2,6%
	223	First afforestation of non-agricultural land	45.425.916	2,0%
	224	Natura 2000 payments (in forest area)	25.500.000	1,1%
	225	Forest-environment payments	10.000.000	0,4%
	226	Restoring forestry potential and introducing prevention	15.000.000	0,7%
	227	Non-productive investments	10.000.000	0,4%
Total Axis 2			824.590.405	36,5%
3	311	Diversification into non-agricultural activities	75.631.727	3,3%
	312	Support for business creation and development	97.696.507	4,3%
	313	Encouragement of tourism activities	82.285.759	3,6%
	322	Village renewal and development	20.000.000	0,9%
Total Axis 3			275.613.992	12,2%
4	413	Implementing local development strategies. Quality of life	126.973.804	5,6%
	421	Implementing cooperation projects	4.170.000	0,2%
	431	Running the local action group acquiring skills and	5.850.000	0,3%
Total Axis 4			136.993.804	6,1%
5	511	Technical Assistance	92.979.200	4,1%
Total 511			92.979.200	4,1%
Grand Total		ural Development Programme for Lithuania 2007-2013	2.260.374.510	100,0%

Sources: Rural Development Programme for Lithuania 2007-2013.

National water management targets

Lithuania fully transposed into national legislation the EU Water Framework Directive; according to the Directive 4 river basins districts (RBD) (Nemunas, Lielupe, Venta and Dauguva) are established. Every district has a River Basin Management Plan with a list of measures which should be implemented to reach 'good ecological status'. The Environmental Protection Agency is designated as a Competent Authority, responsible for the administration of all 4 RBDs and for the River Basin Management Plans (BMP) for those RBDs.



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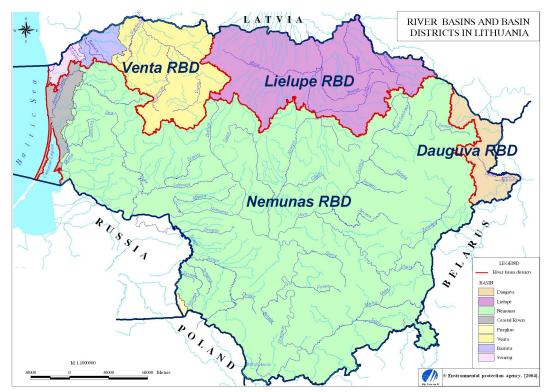


Figure 1: River Basins and Basin Districts in Lithuania

The following are policy targets for water policy in Lithuania: to reach Good ecological status of all Lithuanian surface waters, implement a River basin district management system, and decrease pollution to the Baltic Sea. To implement these targets, in particular with the aim to decrease spread pollution from the agricultural sector, there is the "Programme to decrease water pollution from agricultural sources", approved by the Ministries of Environment and Agriculture. The programme includes the goal to decrease pollution of surface water resources, in particular by nitrogen and phosphorus combinations.

The objectives of the Programme are:

- Implementation of farmer training on environmentally friendly technologies;
- Introduction of pollution liquidation measures for those farms having 10 or more arbitrary units; and,
- Harmonization of EU and National legislation and development of guidelines for dung-yards development at farmers' facilities.

In addition, more specific requirements according to the programme include:

- It is forbidden to fertilize fields in period from December 1st to April 1st,
- Dung-yards (reservoirs) should be a size whereby it will be possible to hold pigs' or poultry manure of 8 months and cattle, horse, and sheep manure of 6 months. Also should be considering collection of sewage from manure loading places and milking places;
- It is forbidden to fertilize fields in water protected areas, if the soil freezes or is covered by snow;
- The amount of total nitrogen (N_b) inserted into the field annually should not exceed 170 kg/ha.

In the BMP the main pressures to Water bodies at risk are:

- Point source pollution (industry, wastewater treatment plants)
- Diffuse source pollution (mainly agricultural sector)
- Water flow regulation (for rivers only)





• Ground water abstraction rates

Agriculture remains the most important actor in BMR because agricultural land covers more than 70% of land in river catchments of $>50 \text{ km}^2$ size, as well as agricultural land coverage is more than 50% in the lake catchments.

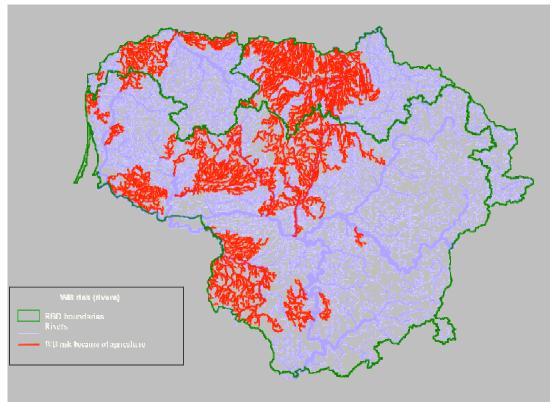


Figure 2: Rivers at risk because of agriculture. Source: Lithuanian environmental protection agency. WB = Water Bodies, RBD = River Basin District

Measures for reduction of anthropogenic pollution to water

The key measure to reduce impacts is to reach sewage water treatment quality standards according to the Council Directive of 21 May 1991 concerning urban wastewater treatment (91/271/EEC). Lithuanian authorities have set the target since 2010 that all settlements with more that 2000 inhabitants should treat sewage water according to the standards of the Directive 91/271/EEC.

Additional measures are mainly concentrated around the following issues:

- Reduce wastewater impact from individual housing;
- Reduce wastewater impact from the agriculture sector;
- Reduce wastewater impact caused by hydro-morphological changes; and,
- Decrease wastewater impact to water quality from industry.

Reduce wastewater impact from individual housing

The measure aims to develop sewage collection networks in remote urban territories and connect individual houses to these networks. The aim of this measure is to also increase wastewater treatment efficiency and the efficiency of administrative inspections.





Reduce impact from the agriculture sector

This measure aims to decrease impact caused by fertilization, as well as to develop fertilization management instruments, these are implemented by Rural Development Plan 2007-2013. Administrative measures include: farmers should have a fertilization management plan for farms bigger than 100 ha as well as dung-yards should be installed if the farm has 300 LU (livestock unit), since 2012 - 10 LU. Other measures related to the reduction of impact to water from the agricultural sector are described in the chapter 'National agri-environmental targets'.

Reduce impact caused from hydro-morphological changes

Concerning this issue the following measures are foreseen: naturalization of watercourses, decreased impact of hydro power plants, restoration of rivers' yield, including fish-ladder instalment.

Decrease impact to water quality from industry

The main problem is that impact from the industrial sector lacks proper assessment because wastewater from industry is loaded to municipal wastewater treatment plants. There is a need indicated in the all BMR to investigate composition of discharge of hazardous substances to water.

Implementing agencies:

There are two main national bodies sharing responsibilities for developing policies within agrienvironmental policy: Ministry of Agriculture (MoA) and Ministry of Environment (MoE).

MoA, in particular its Rural Development Department, is responsible for: developing rural development policy and supervision of associated programmes; coordination of measures within a single programming document of EU Structural funds. MoE through Protected Areas and Landscape and Water Resource Departments take the lead part in development of water management policy as well as policies related to development and management of protected areas (including NATURA 2000) in Lithuania.

At the implementation level there are the Environmental Protection Agency (a subordinate body to MoE) and the National Paying Agency (a subordinate body to MoA) as competent institutions.

Environmental Protection Agency (EPA) is responsible for implementing the State environmental controlling functions, organizing and implementing the State environmental monitoring, as well as implementing water resource protection and management policy.

National Paying Agency (NPA) is the implementing institution for the measures under the National Agricultural and Rural Development Policy. In particular NPA is the institution which coordinates subsidies and payments for farmers and landlords under Agri-environmental measures.

State Protected Areas Service including Protected Areas Directorates are important stakeholders in implementation of the Agri-environmental measures since they are responsible for protection and management of NATURA 2000 sites. The protected areas administrations should work to encourage farmers and landlords to participate in Agri-environmental measures.

Other important players are:

Prefects (Seniunai) whilst this institution does not have formal obligations to consult farmers and landlords on Agri-environmental measures, in most cases they are the first institution where farmers and landlords apply to consult regarding possibilities to participate in Rural Development Measures.





Lithuanian Agricultural Advisory Service have a mission to help all farming people to develop their businesses profitably without causing damage to the environment, and within this mission consult with farmers to participate in Agri-environmental measures.

Implementing issues

At the policy (systemic) level there is a missing cross-linkage between Biodiversity targets and RDP measures, which lack relevance in regards to concrete actions including concrete guidance on relevant measures for biodiversity conservation. The scientific knowledge on biodiversity and information including data of the State environmental monitoring is not proper utilize for developing the measures as well as to improve inefficient measures. That means that effectiveness of implemented agrienvironmental measure should be measured not only by quantity indicators (mowed ha of meadows, peatlands etc.) but also quality indicators (changes in composition of species, evaluated impact to all designated habitat) should be taken into account. For instance if the biodiversity monitoring data doesn't show positive changes in managed habitat by mowing of grassland these measure should not be used in new Common Agriculture Policy programme.

Implementation of Agri-environmental measures has met a major problem in that there is low participation by all farming bodies in this measure. According to statistics from The National Paying Agency by the end of 2010 there were only 10% out of all available funds are contracted farmers within the measure "Natura 2000 payments and payments linked to Directive 2000/60/EC" and 35% out of all available funds are contracted within the measure "Agri-environment payments". However, the situation is very poor in some activities within the "Landscape stewardship scheme", the scheme that has a key impact for implementing water management issues within the agricultural sector, as indicated in Figure 3 below.

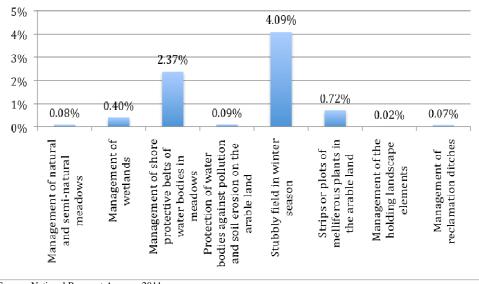


Figure 3: Status 2010 of implementation of Landscape stewardship scheme

Reasons for low implementation of this scheme are several; firstly, the low promotion and visibility of the measure, since the Ministry of Agriculture via national media has mainly been promoting the measures of Axis 1 rather than other axes.

The key driving force for farmers to participate in the measure is economical, but the real cost





Source: National Payment Agency, 2011

assessment (Baltic Environmental Forum, 2008) of management of natural and semi-natural meadows, including payments, indicates that the farmer should get 90 EUR profit per 1 ha, however, there are critical points:

- 1. According to the agricultural scientists productivity of natural and semi-natural meadows is 3-4 times lower compared to productive (to sow by cultivated grass, intensively fertilized) meadows;
- 2. The grass after July 15th (the start date for grass cutting according to the agri-environmental requirements) is not good quality for cattle pasturage and the hay is also not appropriate for cattle feeding.

Also, the compensation cost calculations do not include the costs involved in using special machineries (tools), transportation of cattle, fencing and shepherd's services expenses for the management of wetlands in remote territories (quite a common situation for valuable biodiversity sites).

Taking into consideration the factors listed above, if the farm is concentrated on cattle growing or milk production, then for such farms it is not profitable to participate in agri-environmental measures. As an example, in Poland where the general economical indicators are similar to Lithuania, payments to farmers within agri-environmental measures are 30% higher.

Further, there are complicated application procedures and inflexible controlling mechanisms. For instance within activity 2, management of wetlands, land cadastre information on wetlands does not exist, and as such the farmer has the right, on his/her own risk, to declare the plot as a wetland. One of the key criteria states the plot should have at least 5cm peat layer but if the controlling institution, the National Payment Agency, finds in at least one point the layer of peat is less than 5cm (ignoring the fact that a peat layer of 5 cm is dominating), then the farmers will be punished and will be requested to return all payments she/he has received for the management of this plot. In addition, in terms of flexibility there is no legal avenue for the farmer or the controlling institution to legalize an exemption for not moving hay because of climatic conditions. This is problematic since hay moving when there is a high water table can destroy the fertile surface as well as the values for which this conservation measure was developed.

There is no management (within Common agriculture policy) solution for the utilization of biomass; the farmers mow hay at the latter stage and it cannot be used for agriculture purpose, they considering it as a waster.

Efficiency of the implementation of activity 1, Management of natural and semi-natural meadows, is very low. According to data from the Nature Research Centre (V. Rasomavicius) only 1% of Biodiversity valuable meadows are managed according to this activity. The majority of these meadows are formerly arable plots left not arable for more than 5 years (a formal requirement for farmers to participate in this activity).

Grasslands and wetlands overgrown by bushes and shrubs are not considered as suitable to apply for agri-environmental payments, and restoring (cutting/cleaning) such plots, which are very valuable for biodiversity, are also not eligible for agri-environmental schemes.

An important aspect of farmers' motivation to take actions towards sustainability for biodiversity is the ambition to run a business friendly to the environment and to human health (2004 social survey carried out by the Lithuanian Institute of Agrarian Economy (Kairyte, Ribasauskiene)).

Taking into consideration this aspect the Baltic Environmental Forum initiated the sustainable farmers network "Other farming" which consolidates farmers who have taken the decision to implement sustainable farming. The network has an ambition to be a lobbying organization which will make an impact on the measures of the Rural Development Programme, as well as make a contribution for developing rural territories. Two different scales and types of activity farms are described below.









Vytautas Stankevicius' farm.



This ecological dairy farm was established in 1997 and is located in North Lithuania on the Nemunelis riverbank, which is a natural border on the Lithuanian – Latvian State border. The farm has 300 dairy cows and about 30 employees.

The farmer's attitude of responsibility for the environment has been developed by his father, who was a forester, and who taught him the secrets of nature as well as developed his knowledge on responsible farming.

The farmer decided to join the network because he believes that responsible farming is necessary to maintain Lithuanian nature and make a contribution to the development of rural territories.



Valdas and Rasa's farm





This small-scale dairy farm was established in 2006 and is located in the south part of Lithuania. The farm does not have any employees since there is now machinery used for farming. The main philosophy of the farm is to maintain direct contact with the consumer (or 'the eater' as they call it). The farm has 15 goats and 2 dairy cows, and the main products are fermented cheeses that are unusual in Lithuania.

The farmers decided to manage 14,49 ha of meadow that was reclaimed during the Soviet period and which remained unused after the collapse. The grazing of the meadow in a sustainable way has resulted in some bird species such us the corncrake returning to the meadow.

Cross border cooperation

Within Lithuania the Nemunas River basin catchment covers 85% of the total Lithuanian territory. However; important parts of the catchment are also located in Belarus and Russian federation territories, wherefrom more than half of the pollution load in the Nemunas River is received (see Figures 4, 5 and 6) Therefore, without close cooperation with the Belarusian and Russian authorities it will be very difficult for Lithuania to reach 'good water status' as according to the EU Water Framework Directive .

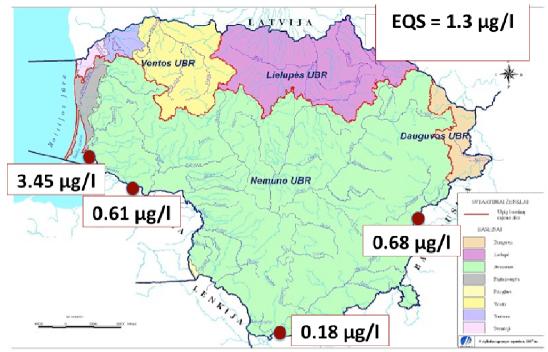


Figure 4: Di(2-ethylhexyl)-phthalate (DEHP) load in the Nemunas River Basin, Lithuania

Source: Lithuanian Environmental Protection Agency, 2009





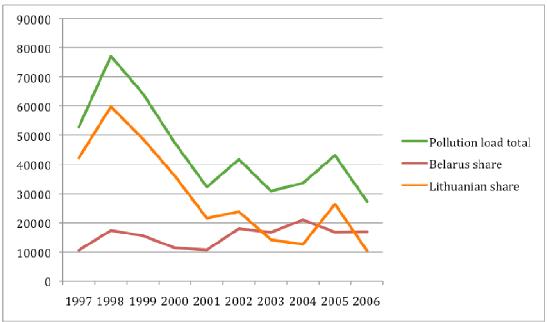


Figure 5: Total nitrogen t/year in the Nemunas River Basin, by country

Source: Lithuanian Environmental Protection Agency, 2009

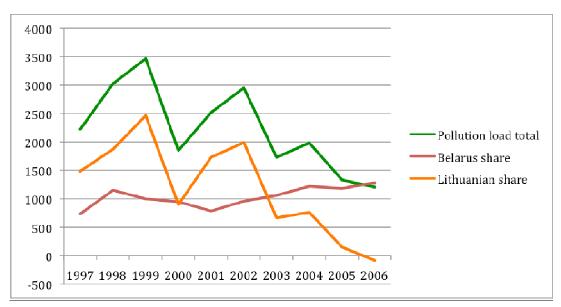


Figure 6: Total phosphorus t/year year in the Nemunas River Basin, by country

Source: Lithuanian Environmental Protection Agency, 2009





Synthesis of issues

The Lithuanian National Strategy for Sustainable Development (2009) provides the guiding framework for implementation of water protection and biodiversity conservation maintenance. However, an integrated Action plan for the implementation of sustainable development objectives is missing. This explains why agri-environmental measures within the Rural Development Programme (2007-2013) are fragmented and do not have a targeted and holistic strategic framework to promote traditional farming for sustaining biodiversity and water resource protection.

Furthermore, monitoring of the impact of agri-environmental measures on environmental quality is not integrated into the national environmental monitoring system. Within the RDP 2007-2013 quantified indicators are based on action targets but not on environmental impact. For instance, targets within 'Agri-environmental payments' include "Number of farm holdings and holdings of other land managers receiving support"; "Total area under agri-environmental support"; "Total number of contracts", etc., but does not include measurements for long term impacts on biodiversity or water quality, e.g. "Number of bird species increased by 10%" or "Level of nutrient concentration in ground water decreased by 2%". It is clear that to measure whether an indicator has been reached should require a complex and scientific assessment, and this could also form part of the RDP.

Conclusions

- 1. The separation of environmental and agricultural issues in the national strategies indicates a lack of political willingness to develop comprehensive and encouraging instruments to implement agri-environmental measures to an appropriate level, as well as to include agri-environmental issues in the strategic agenda's of the appropriate national institutions.
- 2. Institutions responsible for policy development are setup properly with the proper resources allocated and with clearly articulated missions, but there is a lack of understanding regarding the integration of environmental targets into the RDP, and vice versa agricultural issues into the environmental measures. Institutions responsible for the implementation of agrienvironmental measures should develop capacities to increase the quality and effectiveness of implementation of RDP. It is important that responsible institutions will be capable to set up proper objectives and indicators to monitor the impact, and will be able to correct objectives according to the monitoring results. Some implementation tasks such as the promotion and monitoring of the agri-environmental measures could be outsourced, and technical support funds could be utilised for subcontracts.
- 3. Currently agri-environmental measures are not attractive to farmers and as such there should be change from a principle of compensation for loss by choosing less attractive measures to a principle of 'contracts for public benefit', i.e. the State should select the most valuable territories for biodiversity conservation and the territories important for water boundaries, and after allocation of sufficient funds, announce public tender for the management of such territories. The farmers and farming cooperatives could apply for such tenders and then just provide invoices to the controlling institutions. To ensure quality of the management works not only the National Paying Agency should be involved but also the Directorates of Protected Areas Service as well. The farmer should be considered as a service provider, not as a "suppliant" of subsidies.
- 4. Within the agri-environmental measure small, family based farming should be promoted, as it is traditional farming in Lithuania, which allows the agricultural sector to provide a variety of





agricultural techniques and measures. Small farms are more flexible in adopting biodiversity/environmentally friendly measures, which are important to apply to wetlands management.

- 5. Wild pasturage (without surrounding fences) should be promoted because this will decrease losses of pasture fertile and it is environmentally friendly measure because wild pasturage animals have a minimum negative impact on ground-nesting birds.
- 6. The lands owners and farmers owning or renting lands in sites which are very important for biodiversity or water should receive support for infrastructure like construction of access roads, and for purchasing of specific, territory-related equipment and similar. In particular State investment should be agreed on a contract basis to ensure long-term management of the particular site.
- 7. Restrictions on agri-environmental measures should not be universal for all territories in Lithuania as it is now, but rather adopted by particular territories or at least for subgroups, as this is needed to increase the effectiveness of the agri-environmental measures.
- 8. Compensation cost calculations should include costs for using special machineries (tools), transportation of cattle, fencing and shepherd's services expenses for the management of wetlands in remote territories (which is quite common for valuable biodiversity sites).
- 9. More flexibility should be given to controlling authorities to make a decision on applying or not applying different measures because of climatic conditions, and furthermore, farmers should not be punished if climatic conditions are not favourable.





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