Recommendations for the Romanian CAP Strategic Plan and agricultural policy in the context of climate change mitigation and carbon sequestration

Building on the thematic policy papers developed during the EUKI-funded „Landcare Europe captures carbon" project, Agri-Cultura-Natura Transylvaniae Association drew up national recommendations for the Romanian context, having a strong focus on the Transylvanian region and mountain areas.

Woody elements are crucial elements in agricultural landscapes that provide important eco-system services, can improve productivity and animal welfare. Hedgerows, shelterbelts, tree lines, riparian buffers, and small woodlots have significant potential for carbon sequestration within agricultural landscapes. Although they occupy relatively small areas, they store disproportionately high amounts of carbon in long-lived woody biomass and in soils enriched by leaf litter, root turnover, and reduced disturbance. Their deep root systems promote soil carbon stabilization and improve soil structure, while their permanent vegetation cover reduces erosion and carbon loss. At the landscape scale, integrating woody features into farmland can substantially increase overall carbon stocks without removing large areas from production, making them an efficient and multifunctional climate mitigation strategy. They also significantly improve the water retention potential of baren areas – especially in combination with shallow swales, temporary or permanent natural ponds - through improving the micro-climate via more transpiration, deeper root system, lowering the temperature.

Established or maintained ***agroforestry systems*** are recognized in the CAP Strategic Plan (CSP) as part of the agricultural area both for the arable land and for permanent grasslands in the form of protective agroforestry curtains with a width of nor more than 30 metres, provided that this agroforestry system does not jeopardise the fulfilment of GAEC 1. Tree lines and individual trees are also recognized as accepted non-productive landscape features under GAEC 8. Still the digital satellite control system appears to take groups of trees out of the eligibility area of pastures, even though the 4% non-productive area is a minimum requirement and farmers should have the possibility to dedicate more territory for maintaining and improving ecosystem services of their land (keeping the area entirely grazable). Based on discussions with farmers, there seems to be confusion about the eligibility of these landscape features, which indicates the need for more clarity on these aspects especially in view of the growing urgency of improving microclimates in our landscapes.
Furthermore, woody pastures, individual trees and tree lines along crop lands are integral part of the Transylvanian cultural landscape, but have been often cut down in past years and decades to obtain larger eligibility areas. Therefore their new installation both on arable land and permanent grasslands should be at least recognized, but possibly also supported by the CSP. Agroforestry elements accepted for permanent pastures in 4.1.2.1.3. should also include trees within the pastures and not only the protective curtain of 30 metres which is not so common. For example, the Hungarian CAP SP allows for up to 250 trees per hectare, though requiring them in parallel rows or other regular geometric distribution.
DR19 Non-productive investments supporting the establishment of natural protective curtains on arable land for agricultural crops should be extended to permanent pastures, too. In addition to protective curtains, the planting of isolated, rows or groups of trees on permanent grassland and pastures would be highly beneficial and sought after by farmers.

Highly relevant sections of the project's EU recommendations: the EU should make sure that

these agroforestry types (according to EURAF typology) are eligible for funding in the Member States National Strategic Plans:

1. **Wood-pastures:** silvopastoral systems where scattered trees and shrubs are combined with permanent grasslands/pastures used for grazing livestock, **canopy up to 80%** (e.g. Dehesa (ES), Montado (PT), Hutweiden (DE, AT). **This would require in Romania to significantly increase the maximum 40% canopy cover laid down in Law 46/2008 Codul Silvic.** Trees would be very important for animal welfare in hot season. 80% of pastures in Spain are woody pastures with higher canopy cover.
2. **Orchard-grazing**: silvopastoral systems on extensively used grasslands where livestock (e.g. cows, sheep, geese, poultry, pigs) graze under or between orchard trees.
3. **Orchard-cropping**: commercial fruit or nut orchards are intercropped with annual or perennial crops between tree rows.
4. **Alley-cropping**: silvoarable systems where rows of trees are planted at regular intervals with annual or perennial crops grown in the alleys between the rows, e.g. walnuts, timber, poplar, hazel.
5. **Alley-coppice**: silvoarable systems where coppiceable tree species (e.g., hazel, willow) are planted in rows and regularly cut back (coppiced) to provide biomass, fuelwood, or small timber, with crops/pasture managed in between.
6. **Food-forests:** multilayered agroforestry systems that mimic a natural forest structure, composed of perennial trees, shrubs, herbs, climbers, vine, groundcovers, e.g. in permaculture and regenerative agriculture.
7. **Agro-silvo-pasture** wooden structures, crops, and livestock on the same land unit.
8. **Woody-landscape-features:** Trees and shrubs integrated into agricultural landscapes that are not always directly productive, e.g. hedgerows, tree lines, windbreaks, riparian buffers, shelterbelts, field margins [Protected landscape elements]

The maintenance and establishment of agroforestry systems should be covered by the yearly applied eco-schemes of the first pillar (Art. 31 Regulation (EU) 2021/2115) (e.g. CZ, PT, ES, IT, SK). Requirements should be for instance:

- Agroforestry systems do not include invasive plant species
- The wooden areas cover a minimum and maximum percentage of the farmed parcel
- There should be a flexibility in planting design to accommodate site-specific factors
- New woody structures on the sides of fields are accepted as part of the AFS
- AFS planned on locations where they can potentially cause harm for the ecosystem or species, require a permission from the nature conservation authority
- Harvesting of short rotation coppice takes only place in the winter month
- There should be a mix of tree species to allow for gradual harvesting to keep up ecologic benefits, i.e. food for pollinators, birds and other beneficial insects.

To further promote agroforestry systems the Member States should offer Agri-Environmental and Climate Measures ((Art. 70 Regulation (EU) 2021/2115)) for agroforestry systems with high impact for climate and ecosystem services, e.g.

- Diverse systems with multiple tree species and types of agroforestry systems
- Systems with native/old species
- Systems that connect biotopes (Natura 2000 network) with adequate species or complements regional conservation priorities and species-specific needs.
- Systems in areas of high relevance, e.g. plains with little structural elements that suffer from wind erosion
- Wide wooded strips / multiples rows with a minimum width of 5 meters
- Wooden areas combined with flowering strips

- Structures in woodland strips, e.g. deadwood from pruning, piles of stones
- No use of pesticides in the wooded strips

In combination with agroforestry systems or without, ***extensively managed grassland*** should be targeted under eco-schemes also for farmers with more than 10 hectare. Such a support could help to make species-rich grassland more attractive for farmers and to provide these services to the common good. While maintenance of permanent grasslands is of importance according to the CSP and their role in carbon sequestration and water retention is significant, still there is no dedicated intervention for encouraging farmers to practice extensive grazing outside the limited scope of designated areas under different environmental interventions. Abandoned, degraded lands or land with low production yields can be revitalized with appropriate grazing methods, such as ***extensive or rotational grazing***.

> **Rotational grazing** in general describes a grazing system where a large pasture is divided into smaller paddocks allowing livestock to be moved from one paddock to the other easily. (Note be that there are many types of rotational grazing: such as mob grazing, adaptive multi-paddock grazing and others). "Using this method cattle are concentrated on a smaller area of the pasture for a few days then moved to another section of pasture. This movement allows the grazed paddock a rest period that permits forages to initiate regrowth, renew carbohydrate stores, and improve yield and persistency. When utilized properly, rotational grazing can help farmers increase forage productivity. Rotational grazing can help improve productivity, weight gain or milk production per ha, and overall net return to the farm. Rotational grazing allows for better manure distribution that acts as a source of nutrients to the soil. Rotational grazing also has the potential to reduce machinery cost, fuel, supplemental feeding and the amount of forage wasted. Rotational grazing can also help extend the grazing season, allowing a producer to rely less on stored feed and supplement. One of the most desirable attributes of this system is that a producer can design it to fit their needs. Rotational grazing allows a producer to be more in control of the timing and intensity of forage grazed by cattle.

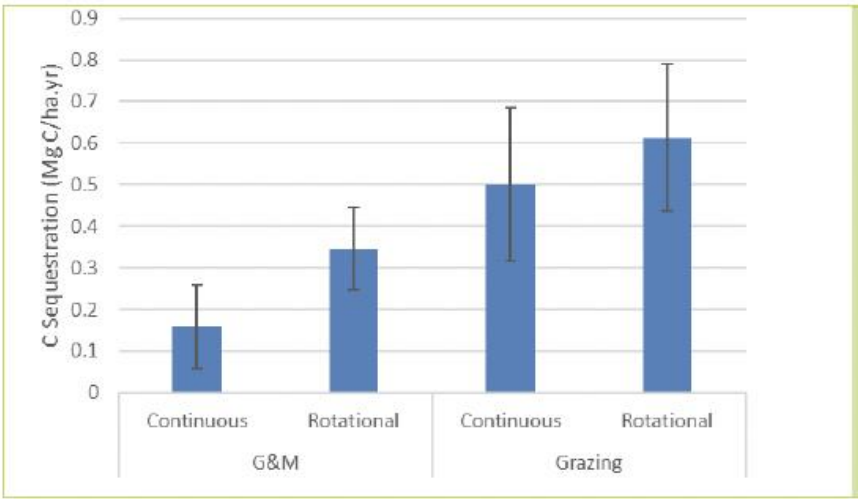

Figure 1. Mean carbon (C) sequestration rate (Mg C ha^{-1} yr^{-1}) for mixed grazing and cutting systems (G&M) or grazing only systems (Grazing) in the EU, NZ/AU, US and other countries (for details see Mini-paper 1, Van Eekeren *et al.*, 2018 based on quick scan of literature by K. Klumpp.

Decreasing number of cattle leads to the succession and spread of invasive species. It is important to keep in mind that in the case of rotational grazing the same area can feed a larger animal stock due to the increasing soil biology and grass yield of the land. Timing aspects and proper planning are more important than the number of animals. Introducing a dedicated eco-

scheme still in the CSP could serve as a pilot scheme preparing for a potential „Coupled support for extensive livestock farms" enabled by the CAP 2028-2034 framework.

Romania could much better exploit its natural endowments for extensive grazing both for rural livelihood and environmental regeneration and climate change mitigation purposes. Purely grass-fed livestock (both dairy and meat) can be expected to be in growing consumer demand in the future due to health and environmental consciousness reasons. Furthermore, the manure of purely grass-fed livestock has a much lower nitrogen content compared to industrially kept livestock fed with protein rich concentrates. Another potential advantage of extensive grazing methods can be the lower levels of veterinary medications, of which for example ivermectin has been found damaging the sensory and locomotor capacities of dung beetles whose activity on grazed pastures might decrease ammonia emission by 50%[1]. Conseqeuntly, encouraging farmers in this direction could lead to numerous economic, social and environmental benefits.

It would be beneficial to support grassland restoration as well, not only proper management. This can be justified by the fact that permanent grasslands reach their maximum carbon storing capacity in 50-70 years, after which they cannot store more carbon (Dr. Znaor Darko, 2024).

Opening such an eco-scheme for extensive and rotational grazing could be built on an intensive information campagne and earning international relevance considering that FAO declared the year of 2026 to be the international year of rangelands and pastoralists. https://www.fao.org/rangelands-pastoralists-2026/en#:~:text=The%20United%20Nations%20declared%202026%20as%20the,knowledge%20*%20Preserve%20ecosystems%20across%20the%20world

The Romanian CAP Strategic Plan (CSP) places emphasis on preserving and maintaining agricultural activity and traditional landscapes in rural areas. Based on observations of the past 5-10 years in central Romania, besides other factors discussed in the CSP (e.g. unfavourable environmental characteristics, aging population, rural depopulation), depleting water resources are increasingly becoming the bottleneck to viable farming activity. These frequent and wide-spread observations contradict the Water Profile factsheet of Romania issued in June 2025 by the European Commission in relation to the European Water Resilience Strategy saying that groundwater in Romania achieves 100% quantitative status. Therefore, it would be advisable to assess and include landscape level water scarcity among the top threats affecting sustainable agriculture at least in affected regions of the country (to be captured by R23 *Sustainable water use* result indicator). The soil's ***water retention*** capacity and moisture level is also crucial for its carbon storing capacity and function, that is why our recommendations focusing on carbon storing agricultural practices place high emphasis on landscape-level water retention.

The CSP could promote landscape level water retention efforts. For example, the latest non-productive investment support[2] under the Hungarian CAP Strategic Plan with a budget allocation of EUR 33 million provides grant support to farmers for the re-diversification of habitats and the restoration of landscape elements, as well as the creation of elements for water protection and retention and erosion control. The amount of funding available for the creation of wetlands is 958 euros/hectare, and for their maintenance 911 euros/hectare per year for 5 years. One of the important goals of the support is not to treat inland waters appearing on arable land or grassland

[1] Presented by Dr. Darko Znaor, Avalon Foundation (NL), Executive Director on our project's first thematic workshop in Slavonski Brod, Croatia, 11 June, 2024 (Source referred to: Verdú, et. al. 2015; Yokohama et al. 1991). Presentation can be found via https://www.landcare-europe.org/events

[2] https://kap.gov.hu/tamogatas/kap-rd21-rd22-2-25

as an "enemy", but to retain them and thus rehydrate the areas. Ecological water replenishment is allowed, but irrigation from the created wetlands is not allowed, so this is not an irrigation investment, but an adaptation of landuse. Such actions are expected to mitigate and adapt to adverse climate change in agricultural areas, protect biodiversity, as well as soil, water and air, and preserve and restore the character of the landscape. The maximum support is around EUR 260 000. ***Romania could develop similar measures under the CSP, which would be in line with the EU's Water Resilience Strategy and could be also important pillar of the Romanian National Nature Restoration Plan required by the EU's Nature Restoration Law.***

Water retention measures can be a promising venue for introducing environmental practices to farmers who are not open to new methods – especially if they have the perception that measures are worsening their liberty and farming potential. Unlike biodiversity or protecting species, water scarcity is an undeniable and debilitating phenomenon even for ordinary rural households and farmers, and as such forces people to seriously consider what they can do differently. To act, they need to be empowered through information, enabling regulatory framework, incentives and good examples.

LEADER could be used as a catalyst for spreading nature-based solutions (NBS) for landscape-level water retention among farmers, local governments and composesorates. See the good practice facilitated and mentored by the Homoród-Küküllő Leader Association[3] promoting small-scale, affordable and feasible solutions in cooperation with communities.

While a mosaic landscape contributes to biodiversity, too narrow land parcels lying perpendicular to contour lines can contribute to severe land erosion stemming from the combination of cultivation and rainfall. Areas affected with such land structure would benefit from a subsidized ***land consolidation program*** to optimize land parcels to facilitate landscape-level water retention measures such as tree and hedge rows, protective curtains, swales, cultivation along contour lines. Individual farmers are not able to initiate any change in this respect, unless they manage to purchase the neighbouring parcels. However, it might be necessary to define a maximum final consolidated parcel size to preserve the ecological services of traditional mosaic landscapes. Thus the land consolidation programme should target the small and narrow parcels where neither economic viability, nor climate adaptation is feasible currently.

Higher aid intensity for investments in regenerative, water retaining farms. Higher aid intensity up to 80% in accordance with Article 71(a)(i) of Regulation (EU) 2021/2115 should be enabled for small farmers practicing or transitioning to regenerative, water retaining farming methods. Transitioning to regenerative farming takes time and is risky and related machinery investment cannot be expected from small actors. Therefore, supporting machinery sharing cooperatives or associations or allowing for composesorates for purchasing machinery intended for the shared use by the farmers who individually cannot afford to invest in replacing conventional machinery to regenerative tools could facilitate such a process. Allowing such machine sharing groups to offer services with the purchased machinery – in case of down time - to external farmers can provide economic return and contribute to long-term sustainability of the transitional efforts. Such possibility to offer services to others should be available for individual farmers as well, who decide to purchase their own machinery. Such possibility does not only improve their financial viability in transitioning to regenerative practices (and can offer an interesting business diversifying model), but it also enables other farmers to experiment with

[3] https://share.google/Kmy0YojKBF3z2K0ES

these methods without having to purchase expensive machinery and without being certain about its efficacy, and thus it can speed up the general transition to conservative practices. Interviewed farmers reported such interest from neighbouring farmers.

The RO CAP SP is ambitious on technical and content level, however, there is still no ***systemic knowledge and information sharing structure*** to channel the necessary knowledge, understanding, possibilities and requirements in an understandable and reliable manner to small and medium sized farmers. Partial information, misinformation or bad news spread quickly and discourage farmers from experimenting with new methods or interventions. Without such a structure, there is a lack of understanding of reasons behind rules among farmers, which leads to a perception of pure administrative burdens and not recognizing self-interest and therefore often to low compliance. ***Supporting demonstration farms*** both for showing their existing good example, but also to further experiment with soil conservation techniques – potentially supported by research institutes and advisory services - could accelerate knowledge and information spread about climate-adapted farming methods. It is reported that state farms are often not open to such experiments.

Recommendations for CAP 2028-2034 in Romania:

The proposed new CAP framework (COM(2025) 560 final, CAP draft) offers new possibilities and flexibility to Member States to develop tailored interventions. ***Higher aid intensity is needed for investments in regenerative, water retaining farms***. For small farmers practicing or transitioning to regenerative, water retaining farming methods minimum 80% aid intensity should be defined and the introduction of an easily accessible microloan fund providing loans up to EUR 50 000[4] with 50% interest rate subsidy. Such incentive schemes are crucial to attract increasing number of farmers to embark on the transitional journey. Regarding investment needs for example, one small regenerative farmer we interviewed, and who transitioned to permaculture and regenerative farming 7-8 years ago, plans to continue planting tree lines and agroforestry system, further optimize his parcel structure and retain as much moisture as possible on his land. After a few initial years, the results of regenerative farming have become obvious also to his neighbours and other villagers (in the form of at least as good yields, less costs, better conditions of his soil, better workability with machines), who very slowly are turning from very sceptical to curious, and in such cases incentive schemes could be a gamechanger confirming that it is an approved and desirable path forward.

The new possibility to offer ***payments for green transition*** (up to EUR 200.000 lump sum) can be an essential tool to promote transitioning towards regenerative farming and extensification of livestock systems. According to farmers we interviewed, in mountainous regions crop production is becoming less and less economically and environmentally viable, the soils are depleted and dry, therefore in such areas pastured animal husbandry, agroforestry and reforestation could be a strategic reorientation. This suggestion is supported by the findings of the European Drought Risk Atlas (2023)[5] by JRC saying „Average annual reductions in yield are estimated as up to 10% less than the expected amounts, with the highest risks located in the Mediterranean area and

[4] By analogy to the ceiling defined under the investment guidelines for InvestEU in Commission Delegated Regulation (EU) 2021/1078 of 14 April 2021.

[5] https://publications.jrc.ec.europa.eu/repository/handle/JRC135215

Romania." Romania is mentioned as one of the countries most severly hit by water-related risk factors.

A ***lump sum transition support*** could allow for purchasing machinery, livestock, land, buildings and to carry out land amelioration works to improve water retention (e.g. swales, ponds). Interviewed farmers report that the transition time is 5-10 years (with at least 30% yield loss in the initial years and increased work hours for learning the new technology), depending on the different environmental conditions and whether livestock can be integrated or not.

For farmers who already converted, ***annual maintenance payments*** could strengthen their viability until they restore fully functional, self-sufficient eco-system services replacing chemicals and heavy machinery load. Based on some discussion with farmers, annual incentive payment appears to be more attractive than committing for 5 years and not being able to respond to market, climate or any other crisis events. Coupled payments should only be paid for animals that are (partly) free ranged or have a grass based fed diet. In addition to the coupled payments, it is also important to provide area-based and/or livestock-based annual payments for following regenerative farming and to extensively manage grasslands with grazing for the purpose of ensuring eco-system services and preserving traditional landscapes in accordance with Art.10(1)(a) CAP draft.

However, there are benefits of the ***multi-year approach*** as well. In multi-annual agreements the possibility for longer, even beyond 5 years term could provide more certainty for farmers to decide over transitioning to new, more climate resilient methods. In such longer term agreements it is of utmost importance to give more flexibility for the farmer to adapt the production technology and to rather link the support to milestones and results (e.g. increased soil moisture, carbon, organic matter content etc).[6] Result-based payments can be more suitable for multi-year schemes than for annual payments, since they might be more attractive for more conscious farmers when managing species-rich grasslands as farmers know their farmlands best and it gives them more flexibility in the management. Result-based payments can be also a good tool to encourage farmers to take responsibility for managing their land sustainably, however, it requires a well-functioning knowledge and advisory system to provide the necessary know-how for new adaptive and regenerative practices. A pilot scheme could introduce a hybrid result-based payment system, where there would be a basic payment for essential practices, while bonus payment could be triggered by proving to reach pre-set indicator species or increased water retention, soil health, soil biology features . The EU-funded BioMonitor4CAP project developed a methodology for easy verification and advanced biodiversity monitoring explicitly for result-based types of support. For higher-value multi-year transitional payments it is important to allow for a transitional period, i.e. to reach a certain share of area under regenerative farming by the end of the commitment period, e.g. to link the amount of support to the degree the farmer is committing to, namely provide EUR 50 000 lump sum, if only 25% of the area is going to be converted by year

[6] There is one such Agri-Environment-Climate measure nr 70.27 in the French CAP Strategic Plan. It provides a result-based flat rate payment for farmers committing to ecological transition and a minimum of 15% improvement in carbon footprint of the farm over a contract period of 5-7 years. Methods for reaching the emissions reduction are not specified in the CAP strategic plan. This approach is innovative within the CAP: instead of paying farmers for implementing practices on a certain area of land, the partly results-based payment depends on farmers demonstrating that they have improved or achieved better climate results, while at the same time gives flexibility for them to achieve such results. The amount is set at €18,000 per farm over a period of 5 years, i.e. €3,600 per year. This can potentially be adjusted according to the size of the holding through flat-rate aid. (See p338 of EC publication "Pricing agricultural emissions and rewarding climate action in the agri-food value chain" by Trinomics, November 2023.)

3-5; EUR 100 000 lump sum for converting 50% of the area and EUR 200 000 for those who commit to convert 100% of their agricultural area to soil conservation techniques.

It would be important to allocate resources for ***continuous, regular and transparent evidence-based monitoring system for climate and environment focused measures*** to assess and verify their efficacy and suitability. Taking into account the seasonality of such monitoring requirements (e.g. crex crex nesting period) it might be more efficient to outsource such tasks to contracted experts.

Especially for transition payments, ***eligibility for composesorates should be ensured***, this should be not excluded by the EU level regulation which in this case (Art.10 CAP draft) talks about farmer and not about collective action, cooperatives or groups of farmers. Supporting composesorates to implement rotational grazing can ensure to integrate small farmers and farmers with mixed farming, maintaining traditional landscapes. Furthermore, targetting composesorates with usually better trained management can lead to faster transfer of regenerative practices than to convince small, uneducated farmers. Composesorates need support for milking stations (to allow for joint milking still on the pastures in the case of herds returning to the village daily, contributing to more homogenous, higher quality milk production), drinking throughs, electric fence, amelioration works using NBS. For larger and more market oriented composesorates and farmers additional financial instrument support (subsidized loan fund) could also be used, e.g. to improve breed genetics and buy animal.

Good practice example of the Asociația de Composesorat din Zetea (Harghita)

The composesorate was founded in 2000 and is run by a professional management responsible for 8000 ha forest and 2000 ha pastures on behalf of five villages. They have around 1000 meat cattle and 6-7000 sheep kept extensively in a rotational grazing system. Recently they managed to build covered sheds using own resources (according to them as composesorate they were not eligible for RDP investment support). The composesorate has always strived to reach financial viability to pay dividends to its farmer owners, for which they are mainly fattening and selling live cattle for export and they also have a forest fruit processing branch.

They decided to introduce rotational grazing 20 years ago to decrease the labour expenses and to improve the soil structure and moisture content and the grass yield. This grazing system also allows for more robust vegetation regrowth and thus mitigates heat stress for the pasture in the summer. The rotational grazing system also forces the cattle to better graze on the young shoots of invasive species and trample enough on the rest, which again decreases the need for manual mowing and maintenance works. In traditional extensive grazing system the cattle always find more delicious grasses and leaves the invasive species to grow. It is important to keep the livestock at the optimal size, because undergrazing leads to overgrown, overaged grass, while overgrazing depletes the vegetation.

For rotational grazing systems access to water on each parcel is of utmost importance. Usually they keep 70-80 cattle on a 7-10 ha parcel for 10-15 days, depending on the weather and the condition of the grass. According to their experience, at least 3-4 parcels are required to allow for sufficient regeneration time for the biomass before returning to the same parcel.

They also offer advice and mentor program to dedicated young farmers, namely they have rented out pastures to 4-5 young farmers, 50-100 hectares each. Together with the rented land they also provide the starting animal stock (to be paid for later on), the rental period is for 5 years with 1 year probation.

The National Partnership Plan should foresee ***support for communities, local governments, farmers to implement NBS measures*** to improve the water retaining capacity of the landscape, to restore groundwater levels and short-water cycles. The great benefit of these methods is that there is no need for large sums of support. In Slovakia, for example, 30-100 000 EUR was granted to almost 500 local governments to implement significant landscape level NBS for water retention (including 50-100 different types of weirs, minor landscape alterations, stormwater detention basins, planting trees and hedgelines etc.)[7]. In the Romanian pilot project facilitated by the Homoród-Küküllő Leader Association around EUR 2-3000 was proven sufficient to establish 10 nature-based weirs of logs, wood, stone, provided the locals provide their labour voluntarily and composesorates pay for part of the used materials. Following existing good examples, a pilot programme could be developed to provide communities (local governments and/or composesorates, similar land management organizations) up to 10 000 EUR support to implement NBS in non-cadastrated areas with eligibility requirements linked to estimated water retention potential (Slovakian methodology can be transposed).

Finally, we find it essential for the ***Romanian AKIS to include advice to farmers and forest holders on sustainable and resilient management of land, including its surface and underground water resources***. The CAP should include support that enables the consultation

[7] https://www.waterholistic.com/project/slovak-landscape-and-watershed-restoration-2010-2012/

of farmers on soil management. Land managers, policymakers, and conservationists should work collaboratively to ensure that agroforestry supports both, climate resilience and biodiversity. Thus, the National Strategic Plan should include an attractive scheme that enables agroecology consultants to advise farmers on agroforestry systems. These should be eligible not only for farming advisory services but also for qualified NGOs like Landcare(-like) organizations and model farms. The consultation should not exclusively focus on CAP measures and requirements. It should rather be a holistic approach including education on soil health, soil functions, soil biology and water management. Supporting demonstration farms should be a key pillar of the new AKIS framework.
Support through the National Partnership Fund needs to finance ***LEADER groups*** also ***to build capacity and disseminate knowledge among farmers, local governments and composesorates about NBS for landscape-level water retention methods***. Community-level NBS interventions and related necessary knowledge are easy to pass through study trips and capacity building of LEADER groups (the ***Homoród-Küküllő Leader Association*** in Harghita county can share its experiences on facilitating such process and implementing related support measure for landscape rehabiliation and rewetting, L804). This potential function of LEADER groups is highly compatible with Article 18(4) of the CAP draft regulation on projects involving value added capacity in transformation, environmental transformation of rural areas and strengthening social capital.

We would recommend the following themes for the Romanian ***European Innovation Partnership*** framework: water retention, NBS, agroecology, permaculture, rotational grazing, grass-based meet and milk production and collective investments, local slaughter points, processing, marketing. The products that derive from extensive grazing and/or herbaceous feeding of livestock must be recognizable by the consumer. For this reason it is necessary to support the development of supply chains that guarantee traceability “from pasture to plate”. All forms of cooperation that allow the pursuit of economies of scale must be supported, in terms of technical means, the use of manpower, in terms of improvements in the quality of life of those who lead livestock to pasture, with systems of staff rotation, milk collection, slaughter and distribution that do not leave individual suppliers isolated.

Further technical suggestions:

- It has been noted by farmers that the specific requirement under PD04 to apply soil conservative technology on 50% of the land is too high, since it is very risky to convert, it needs experiment and learning and not a smart business decision to shift production technology at that rate from one year to the other, it can lead to significant financial losses in the initial years, and the provided support does not compensate for that. Farmer experience shows that on heavy clay soils it might take up to 4 years to use cover crops before one can start with min-till technology.
- Farmers say that PD04 requiring 3-5% fallow land is a waste of resources and just enables weed to grow up. Instead or as an alternative option the creation of flowery plots, so-called bee pastures would be more beneficial for the environment and less disadvantageous for later cultivation. In the Hungarian eco-scheme, for example, there is no minimum fallow land required, but rather a general 10% requirement for non-productive area, leaving it to the farmer to decide if he wants to leave it for fallow land, wetland, pond, field margins or other landscape feature. Option C requiring the planting of 2 trees per hectare is considered not meaningful by some farmers, it should require protective curtains or at least a tree/hedge line.

- Protective agroforestry curtains on slopes should be allowed to be at least 50 m wide to provide more effective water retention, anti-erosion and humidifying effect and serve as habitat.
- Mountain pastures are covered with rocky, gravelly, heavy clay soil and they would need some level of soil loosening, aeration, manure, potentially liming to improve the soil structure and the vegetation growth. Heavy rains can turn these pastures into mud, after which prolonged drought season can turn their surface into concrete-like. Rotational grazing is not sufficient. Agri-environmental schemes do not allow for mechanical intervention or over/reseeding. Not ploughing, but some subsoiling would be highly beneficial.
- It is reported that composesorates are not supported by investment measures, while their role in maintaining large portion of the rural landscape in central Romania is significant and could be used for demonstration purposes to other farmers.
- In light of climate change and depleting soils, it is difficult for farmers to respect the mowing deadlines e.g. in the case of DR01 Package 3.1, because the quality of hay after 1 August is close to that of straws, it is not nutritional enough for the animals and forces farmers to complement their fodder with imported feed, which increases their production costs. This can deter farmers from opting for this scheme. A well-organized advisory system could help identify the most plausible nesting spots of the corn crake (crex crex) and allow farmers to mow the area outside those spots earlier than 1 August when the hay is still valuable. Alternatively considering earlier mowing date for at least part of the parcel could be an option leaving sufficient high grass for the precocial, flightless chicks to hide and feed.
- To support the regenerative transition, nature-friendly measures such as nests for predator birds and T-perches should be supported.
- EIP working group on permanent grasslands 2016 recommendation: Reseeding permanent pastures when necessary with mixtures of plant species of high nutritive value to maintain livestock performances but also to provide floral resources to pollinator insect communities and therefore simultaneously contribute to ecosystem services and contribute to the production of added valued products such as honey (e.g. legume Trifolium or Medicago species are very attractive to bees and bumblebees) or cheese with higher quality of CLA. Use of effective and ecologically friendly methods to increase seeding and reseeding (e.g. over-drilling[8] on organic soils, animal to reseed)
- In the case of ditches accepted as landscape features in 3.10.4., also ditches (to be) established for the purpose of water retention in the landscape (so-called swales) should be included, not only those for irrigation and drainage purposes.

[8] Over-drilling on pasture is a grassland renewal method where a special seed drill places new grass/clover seeds directly into an existing, unploughed pasture to improve forage quality and yield, offering benefits like less soil disturbance and erosion, but requires good timing (open swards in spring/autumn) and management (tight grazing before, light grazing after) to reduce competition from the old grass for the new seedlings to establish successfully.

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