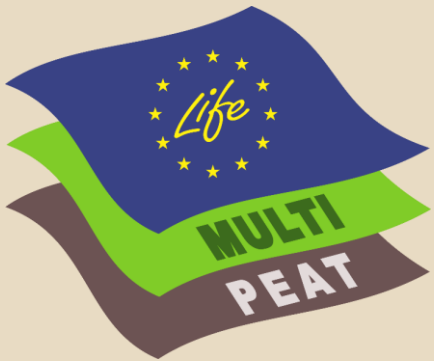




Recommendations for implementing the CAP and the WFD

Experience from five EU countries: Poland, Germany, Ireland, the Netherlands and Belgium (Flanders)

Eurosité – the European Land Conservation Network

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Recommendations to the Common Agricultural Policy (CAP)

**Comprehensive report
including national analyses for:**

Poland, Germany, the Netherlands, Belgium (Flanders), Ireland

LIFE MULTI PEAT

LIFE20 CCM/DE/001802



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CAP, WFD, NRL – Peatland policies

Two international analyses, five countries, 2024–2026 — prepared with the LIFE Multi Peat partners

- About half of the EU's **35 million hectares** of peatlands are degraded by drainage, causing roughly **5% of total EU greenhouse-gas emissions**.
- The five project countries are among the most drained in Europe: **76% Belgium, 82% Ireland, 85% Poland, 95% the Netherlands, 98% Germany**.
- Agriculture is by far the main cause of degradation — so **CAP rules largely determine** whether further degradation is halted.
- The condition of a peatland is above all a function of its **water table** — which makes the **Water Framework Directive** and its River Basin Management Plans the second key lever.
- The **Nature Restoration Regulation** (Art. 11) requires restoration measures on $\geq 30\%$ of drained agricultural peatlands by 2030, 40% by 2040 and 50% by 2050 — but rewetting stays voluntary for private landowners.
- Both analyses ask the same question: **do the existing frameworks support or constrain** peatland protection and restoration?





The CAP analysis: what we examined

GAEC 2 conditionality, eco-schemes and agri-environment-climate measures in five CAP Strategic Plans

- Builds on the LIFE Multi Peat position paper of **April 2025**, responding to the Commission's CAP simplification package.
- It tests the **three peatland objectives** set out in 2019 by an alliance of 23 conservation organisations: guaranteed eligibility of managed wet peatlands for CAP payments; phasing out payments for drained peatlands; and result-based payments rewarding ecosystem services.
- Seven years on, **none of the three has been fully achieved** in any of the five countries, and drainage-based use of peatlands remains possible with CAP support.
- The envelope is large: in financial year 2024, some **23% of direct payments (EUR 8.6 bn)** went to eco-schemes and almost **50% of rural development spending (EUR 2.5 bn)** to environmental and climate commitments.
- The July 2025 proposal for the **post-2027 CAP** opens the chance to design integrated packages for wet agriculture, paludiculture and rewetting.





CAP – Poland

GAEC 2 finally in force in 2025 — but the highest emitters stay outside it

- GAEC 2 applies only to soils with **≥40% organic matter** in the top 40 cm — a threshold 2.7 times higher than Germany's. It covers about 399,900 ha.
- As a result, roughly **55% of agriculturally used peatlands** — the most decomposed and highest-emitting — remain unregulated.
- New drainage and its renewal are prohibited, but **maintenance by mowing and dredging is still allowed**;
- The only result-based instrument, the eco-scheme “**Water retention on permanent grasslands**”, targets 315,000 ha but paid on only **116,855 ha in 2023**, and is restricted to organic farms and parcels already under AECM.
- AECM cover ~300,000 ha of grassland, yet **peatland variants reach little more than 5,000 ha**, with no requirements on rewetting or water level.
- Farmer survey (OTOP, 10 farms): **none** had received the water-retention payment and only **two knew of GAEC 2**; barriers were bureaucracy, jargon and lack of advice.





CAP – Germany

Broad, science-based coverage — undermined by permissive rules

- GAEC 2 applies to all soils with a ≥ 10 cm layer of **$\geq 15\%$ organic matter** in the top 40 cm, covering peat and other wetland soils — the widest definition of the five.
- But the rules barely exceed normal practice: ploughing is capped at **30 cm — the usual depth in Germany** — ditch maintenance is loosely framed, and new drainage may be authorised by local authorities.
- Germany is the **EU’s largest emitter from drained peat**: organic soils are $\sim 5\%$ of the territory but emit ~ 53 Mt CO₂-eq per year, about 7% of national emissions.
- AECM are strong but uneven, designed by the Länder. Rewetting measures work well in **Brandenburg and Mecklenburg-Western Pomerania**; paludiculture is funded in only those two states ($\sim$ EUR 450/ha/yr)
- Lower Saxony’s “peat-friendly impoundment” covers just **2,666 ha — some 0.75%** of the state’s 497,463 ha of organic soil.
- Outside the CAP, a **EUR 1.3 bn “Palu scheme”** was approved in April 2026 to rewet around 90,000 ha.





CAP – Belgium (Flanders)

GAEC 2 as a legal reference rather than a peatland instrument

- GAEC 2 largely **mirrors existing Flemish nature law** and applies mainly to peatland habitats inside Natura 2000, where conversion, ploughing and drainage are already prohibited.
- Drained agricultural peatlands **outside Natura 2000 therefore stay outside effective conditionality** and continue to receive CAP support.
- The mapping study that was to extend GAEC 2 to agricultural peat **has not been agreed or implemented**.
- Nearly all of the remaining **~6,000 ha of peat soils** are fragmented and largely degraded; close to three-quarters of Flemish wetlands have been lost since the 1950s.
- Eco-schemes and AECM are relevant but not peat-specific: perennial grassland (~EUR 130/ha, 105,533 ha), the “soil passport”, and temporary-to-permanent grassland (EUR 325/ha).
- VLM farmer survey: many were **unaware they farm on peat**, none would stop pumping groundwater for subsidies alone, and a clear majority rejected paludiculture concept.





CAP – The Netherlands

The Strategic Plan itself concedes that GAEC 2 is not ambitious

- GAEC 2 nominally covers peatlands but has **no operational definition**; it defers to the drainage norms set by the regional water authorities.
- Those norms usually keep the water table **more than 40 cm below ground** to allow heavy machinery — whereas effective peat protection needs roughly **0–20 cm**.
- Peat covers ~290,000 ha (7% of the land), three-quarters of it farmed as dairy pasture: the source of **over 90% of Dutch soil-derived CO₂**, some 4 Mt per year.
- Implementation of GAEC 2 is not ambitious, and defers ambition to a later step after voluntary preparation — a policy that in practice preserves the status quo.
- The single menu-based eco-scheme (at **EUR 60/100/200 per ha**) contains **no peatland measures**; the collective ANLb reaches only 110,000–135,000 ha.
- Peat-meadow support rests on the **voluntary Cooperation intervention (Art. 77, ~EUR 200 m/yr)** rather than the mandatory route offered by Articles 71 and 72.





CAP – Ireland

A light-touch standard alongside Europe's strongest results-based scheme

- GAEC 2 entered into force only on **1 January 2025** and was designed to minimise disruption: shallow ploughing, reseedling and the maintenance or replacement of existing drains all remain permitted.
- It applies only where **at least 50% of a parcel** is mapped as peat on the Teagasc–EPA map, and rests on a **depth-based rather than organic-matter** definition.
- Some **330,000 ha of grassland on drained organic soils** are the single largest source of Ireland's land-use emissions (~6.8 Mt CO₂-eq in 2022); about 85% of Irish peatlands are drained or degraded.
- **ACRES** (~EUR 1.5 bn, up to 50,000 farms) combines cooperation zones with **results-based scorecards**, including for peatland and bog habitats.
- An unusually strong project base supports it: **LIFE IP Peatlands and People, LIFE IP Wild Atlantic Nature and FarmPEAT**.
- The key risk is that eco-schemes end up **paying for practices already allowed** under a weak GAEC 2, instead of rewarding rewetting, drain-blocking and paludiculture beyond the baseline.





CAP – final recommendations

Across the five countries the CAP still has more negative than positive impacts on peatlands

- Extend **GAEC 2 to all agricultural peat and organic soils**, defined by a scientific organic-matter threshold — ideally Germany's $\geq 15\%$.
- Turn GAEC 2 into a **hydrological standard**: ban new drainage and renewal, regulate ditch maintenance, and set measurable, progressively rising water-level targets.
- Phase out **arable cropping and deep tillage on peat**, allowing soil disturbance only to establish paludiculture.
- Base conditionality and voluntary schemes on **up-to-date, public maps** of organic soils, with clear farmer-notification procedures.
- Make peatland eco-schemes and AECM available in **all peat-rich regions — not only Natura 2000** — with genuine hydrological requirements.
- Raise payment levels and **lengthen rewetting commitments to 10–20 years**; list reed, cattail and sphagnum as eligible agricultural products.
- Ensure **coherence**: eco-schemes and AECM must reinforce GAEC 2 and sit within national peatland strategies and coordinated water management.
- Address the **socio-economic barriers** — compensation, simpler rules, advice, full-scale demonstration — and align the CAP with the Nature Restoration Regulation (Arts. 4 and 11).



The WFD analysis: what we examined



River Basin Management Plans of the third cycle (2021/2022–2027) in the same five countries

- Peatlands are **not water bodies** under the WFD — but the Directive explicitly extends to **terrestrial ecosystems and wetlands that depend on aquatic ecosystems**.
- Each national analysis follows a common structure: **visibility** of peatlands in the plans; **drainage as a pressure; groundwater-dependent terrestrial ecosystems**; links to **protected areas**; and integration at **catchment level**.
- Every analysis is anchored in a **LIFE Multi Peat demonstration site** within the basin studied.
- The report treats the WFD not as a nature-conservation instrument but as a **water-management** one, and asks how far the plans already recognise peatlands.
- Context matters: the announced **WFD revision** and Directive (EU) 2026/805 have already added two exemptions to the non-deterioration principle on which restoration depends.



WFD – Poland



Visible in habitat tables, absent from water management

- Third-cycle plans (IIaPGW) mention peatlands mainly in the summary tables about **Natura 2000 habitats**, water-dependent ecosystem tables and protected-area sections — not as hydrological units.
- Several districts do define river types by peatland share (**Rz_org, P_org** — river or stream in a valley with a high proportion of peatlands), showing recognition as a landscape feature only.
- The analysis focused on the **Danube basin**, covering Torfowiska Orawsko-Nowotarskie, where the project restores peatland — there, peatlands appear only in the Natura 2000 appendix.
- The **Czarna Orawa water body (RW120016822279)** has clearly defined objectives and pressures, but **no mention of peatlands**, even though peatland-dependent habitats occur in the catchment.
- Water-level requirements (e.g. no deeper than 10 cm below ground for habitat 7140) appear as **conservation conditions, not water-management measures**.
- The Programmes of Measures contain **no operational peatland actions**, and peatlands are not recognised as retention or water-quality systems at basin scale.



WFD – Ireland



The exception: peatlands integrated systematically into water planning

- The **Water Action Plan 2024** treats peatlands as a distinct thematic issue in the **main plan text**, not confined to annexes.
- They are identified explicitly as a **pressure, a management priority and a restoration opportunity**, and discussed alongside climate, land use and biodiversity.
- A dedicated action set, **Peat 1 – Peat 8**, links the National Peatlands Strategy, an NPWS sectoral work plan, restoration on raised bogs, blanket bogs and fens, the LIFE Integrated Projects, landslide research, agri-environment integration and cutaway-bog rehabilitation.
- Pressures are named directly: **drainage, peat extraction, turbary and afforestation on peat**, with restrictions in acid-sensitive headwater catchments.
- Climate impacts are recognised too — the **drying of peatland reducing natural filtration of pollutants**.
- Peatland restoration is repeatedly referenced as a **measure contributing to ecological and chemical status**, and tied to catchment planning and funding mechanisms.



WFD – Germany



Acknowledged in the narrative, missing from the measures

- The **Elbe** plan recognises Länder peatland programmes as an important part of **stabilising the landscape water balance** — but only in strategic, descriptive sections.
- Peatlands are **not systematically identified as pressures**; water-body profiles use generic terms such as “land drainage” or agricultural diffuse pollution.
- At the **Häsener Luch** project site, the Welsengraben Programme of Measures does require reduced pressure from land drainage and reduced nutrient inputs through drains — **without naming peatlands**, and with no action plan or timeline.
- Groundwater bodies covering large peat areas exist (e.g. **Obere Havel**), yet peatlands are **not designated as groundwater-dependent terrestrial ecosystems** and receive no groundwater objectives.
- **Moorentwicklungskonzepte** and Länder peatland programmes are listed among relevant plans, but operate outside the WFD and are not binding under RBMP implementation.
- The **LAWA catalogue already offers ready templates**: natural water retention, reducing the impact of land drainage, and reducing nutrient inputs through drainage systems.



WFD – The Netherlands



Structural omission — the weakest integration of the five

- The national plans for the **Rijn, Maas, Schelde and Eems (2022–2027)** contain no explicit references to peat or peatlands as hydrological systems or management priorities.
- Peatland drainage and peat degradation are **not identified as pressures**, despite extensive national scientific evidence of their impact.
- Water-body documentation describes nutrient enrichment, altered groundwater levels, subsidence and water-level management — **without naming peat as the underlying driver**.
- The **Azelerbeek** factsheet identifies water-quality and hydrological pressures but never mentions peat soils, although the catchment includes peat-influenced landscapes.
- Peatlands such as **Witte Veen** are not defined as priority groundwater-dependent terrestrial ecosystems, and **no groundwater-level objectives** are set for their preservation.
- Peat is handled instead through parallel **climate, subsidence, agricultural-transition and paludiculture** policies, outside the RBMP structure.





WFD – Belgium (Flanders)

Local recognition without integration into the plans

- Peatlands are **absent from the main Schelde and Maas plans** and from their non-technical summaries.
- They surface only in basin-specific documents: the **Netebekken** plan calls the remaining valley peat soils an important point of attention, noting that drying degrades peat and releases CO₂.
- Core areas are even named — **Grote Caliebeek, Geels Gebroekt, Schupleer, De Most, Het Scheps** — but this is **not translated into objectives or measures**.
- The water bodies at the **Grote Beek** project site (L121_1045, VL05_122) are characterised in detail, yet **peat drainage is not listed as a pressure**.
- Peatlands are **not designated as groundwater-dependent terrestrial ecosystems**, and rewetting is not defined as a groundwater measure.
- Restoration is driven instead by Natura 2000 management and projects — **Peat Pals for LIFE, CarePeat, ADMIRE, BUFFER, CANAPE** — rather than by the WFD framework.



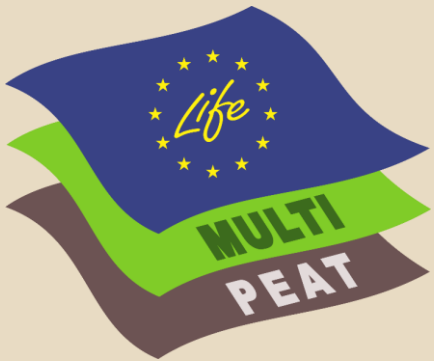


WFD – final recommendations

The framework is already sufficient — the binding constraint is implementation, not regulation

- Recognise peatlands as **functional components of river basins** — in the main text of future plans, not in annexes or protected-area sections.
- Identify **peatland drainage and degradation as pressures**, and link them to failure to achieve good status — the step that justifies restoration as a WFD compliance measure.
- Integrate **rewetting and hydrological restoration into Programmes of Measures**, prioritised where peatlands influence at-risk or failing water bodies.
- Strengthen the **groundwater route**: designate peatlands as groundwater-dependent terrestrial ecosystems with matching water-table objectives — the single most underused opportunity.
- Improve **coherence** between the WFD, the Habitats Directive, and climate and soil policy, operationalising within the plans what is already done under other frameworks.
- Use **catchment-scale planning** to prioritise peatland-rich sub-catchments within natural water-retention, flood and drought strategies.
- Strengthen **monitoring of peatland hydrology**, use the existing scientific evidence, and build capacity in water authorities.
- Ireland shows that systematic integration is **feasible and effective** — the task now is to scale it up across Europe.





Thank you!

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Learn more at: [**www.multippeat.org**](http://www.multippeat.org)

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