



# Protecting farmers by protecting nature

Preserving wetlands under the  
Common Agricultural Policy





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Cover photo Wet meadows © Wiesław Król



Kiltimagh, Co. Mayo, Oxford Bog. Peatland restoration project led by Green Restoration Ireland (GRI) and the local community. © Wetlands International

# Summary

Wetlands and peatlands are vital ecosystems that deserve protection, not only for their rich biodiversity, but also for their role in reducing flood risks, mitigating water scarcity, filtering pollutants, and protecting farmers and their fields from the impacts of climate change. The Common Agricultural Policy (CAP) for 2023-2027 introduced a new standard, the Good Agricultural and Environmental Conditions (GAEC) 2, focused on wetlands and peatlands to safeguard their carbon-rich soils. The maintenance of existing wetlands and peatlands on farmland is vital for the proper functioning of agri-ecosystems and protection of livelihoods.

With the GAEC 2, Member States now have a starting point legislation, aimed at preventing further destruction of these habitats. The implementation and enforcement of this standard should be strengthened and not weakened by the upcoming CAP simplification package, expected in May 2025. Its weakening would not only jeopardise the achievement of the EU environmental, climate and agricultural objectives, but would also undermine the level playing field between Member States, penalising farmers in those Member States that introduced and applied the GAEC 2 on time. Despite being framed as simplification, the proposed changes risk introducing new rules midway through the CAP period, running counter to farmers' demands for a stable and predictable regulatory framework

While GAEC 2 provides essential minimum protection for peatlands and wetlands, additional voluntary measures under the CAP (eco-schemes, ENVICLIM) are needed to drive more significant improvements. These measures can incentivize more actions, such as peatland restoration and the gradual introduction of systemic solutions like a peat ban<sup>1</sup>. Importantly, these measures can also contribute to delivering on the Nature Restoration Regulation (NRR) objectives, as CAP funding can be leveraged to support the restoration and rewetting targets under the NRR. GAEC 2 sets the baseline, but a coordinated and well-funded approach across CAP instruments is essential to promote long-term ecosystem restoration and the sustainable use of carbon-rich soils.

This policy brief synthesises findings on the GAEC 2's implementation and effectiveness in 16 Member States with the view to improve its application on the ground and ensure that farmers are adequately supported in protecting these vital habitats.

<sup>1</sup> A "peat ban" refers to the gradual phase-out of peat extraction and use, especially for horticulture and energy, to reduce carbon emissions and ecosystem degradation. Systemic solutions can also include: supporting re-irrigation and rewetting measures, and promoting paludiculture by incentivising the use of biomass-based products (e.g. in construction or insulation materials). Support for the development of paludiculture through the promotion of solutions (e.g. in construction) based on products derived from paludiculture.



# 1. Background

Despite covering only 3% of the Earth’s surface, peatlands are the most efficient terrestrial carbon sinks, while also supporting biodiversity and regulating the water cycle.<sup>2</sup> However, when degraded, they become major GHG emitters,<sup>3</sup> and can contribute to nutrient loss and increased nutrient loads in surrounding ecosystems — particularly as a result of artificial drainage. This degradation causes significant environmental damage and leads to the loss of vital ecosystem services.<sup>4</sup>

**T**he EU’s Common Agricultural Policy (CAP) has long contributed to the degradation of wetlands and peatlands by incentivising farmers to expand production by converting these ecosystems into farmland.<sup>5</sup> Equally concerning is the continued management of already drained grasslands, often maintained solely to receive CAP payments, even in the absence of any real demand for outputs like hay. In fact, around 50% of degraded peatlands in temperate and subpolar zones have been drained for agricultural use, and in some Member States, this degradation is intensifying. For example, in Poland, an increasing number of meadows established on peatlands are being converted into arable fields each year.<sup>6</sup>

The CAP 2023-2027 introduced a new green architecture to improve its environmental and climate performance and foster

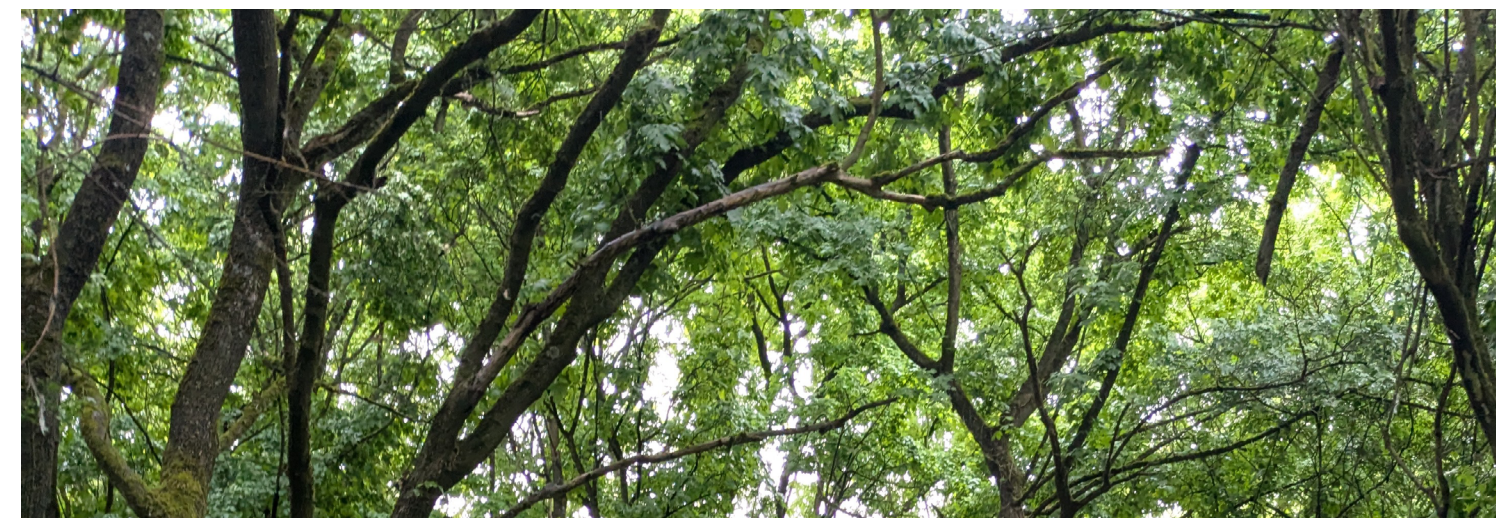
changes towards more sustainable production models. This includes conditionality rules, requiring farmers to meet Good Agricultural and Environmental Condition (GAEC) standards.<sup>7</sup> Among these, GAEC 2 focuses on protecting peatlands and wetlands. The inclusion of these ecosystems is a positive development, but without robust support and oversight, their protection and restoration risk falling short of their potential impact.

For GAEC 2 to be effectively implemented, agricultural areas classified as wetlands and peatlands must first be properly mapped, based on a clear and consistent definition. Member States were required to complete this mapping, with the option to delay GAEC 2’s implementation until 2024 or 2025 if mapping was not finished.

The March 2024 CAP simplification package already weakened key

environmental safeguards, and the forthcoming 2025 package risks further eroding the environmental baseline. Removing GAEC 2, or granting Member States greater flexibility in defining peatland and wetland protection rules, would undermine the effectiveness of existing safeguards. Such changes cannot be considered simplification—they would amount to a further step towards deregulation.

It is essential to maintain the protection and management of peatlands and wetlands at the EU level to ensure coordinated, consistent, and comprehensive protection efforts across all Member States. Given the transboundary nature of climate and biodiversity challenges, maintaining a common EU framework is essential for ensuring coherent and effective action.



## Methodology:

This assessment is based on data from EU publications, including the analysis of approved CAP Strategic Plans<sup>8</sup>, and insights gathered through a questionnaire distributed to national experts from Wetland International Europe, BirdLife Europe, EEB and WWF. The questionnaire aimed to capture perspectives on the implementation of GAEC 2 across EU Member States. In total, we received 19 responses from the following countries: Austria, Belgium, Bulgaria, Croatia, Czech Republic, Estonia, Finland, France, Germany, Hungary, Ireland, Italy, Lithuania, Netherlands, Poland, Slovenia, Spain.

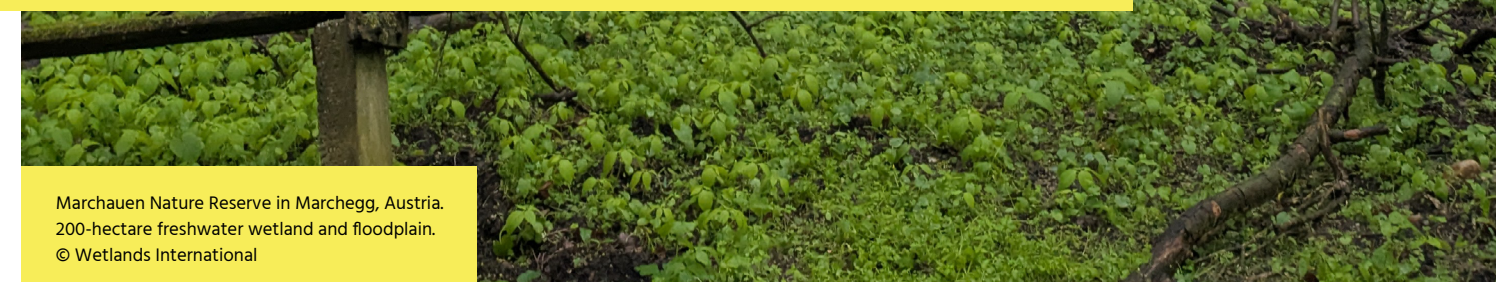
The questionnaire looked into following aspects:

- The extent to which the following key requirements for the protection of peatlands and wetlands have been incorporated into the national-level design of GAEC 2
- Ban on the Conversion of Peatlands and Wetlands
- Ban on Additional Drainage and Renewal of Drainage Systems
- Ban on Peat Extraction and Burning
- Other Restrictions
- GAEC 2 effectiveness and robustness
- The status of mapping in each country
- GAEC 2 implementation, monitoring and enforcement
- Key challenges and barriers faced by managing authorities and farmers

The findings were used for formulating policy recommendations.

<sup>2</sup> UNEP, 2022, Global assessment reveals huge potential of peatlands as a climate solution. Global assessment reveals huge potential of peatlands as a climate solution.

<sup>3</sup> Wetlands International, 2024, Morsels From the Moor: celebrating the flavours of Europe’s peatlands and a new future for these wetlands ecosystem, p.7, available at World Wetlands Day: Putting delicious peatlands on the spotlight - Wetlands International Europe. <sup>4</sup> Gramlitch A., Strolla S. et others, 2018, Effects of artificial land drainage on hydrology, nutrient and pesticide fluxes from agricultural fields, available at <https://11nq.com/19SKS>. <sup>5</sup> Wetlands International Europe, Greifswald Mire Center, 2020, Exchange of views on post 2020 CAP and its effect on farming on organic (peat) soils, available at <https://11nq.com/8AvHu>. <sup>6</sup> Joosten H., Clarke D, 2002, Wise Use of Mires and Peatlands. Background and principles including a framework for decision-making, International Mire Conservation Group, International Peat Society. <sup>7</sup> EC, 2022, Common Agricultural Policy for 2023-2027 - 28 CAP strategic plans at a glance, available at [https://agriculture.ec.europa.eu/system/files/2022-12/csp-at-a-glance-eu-countries\\_en.pdf](https://agriculture.ec.europa.eu/system/files/2022-12/csp-at-a-glance-eu-countries_en.pdf). <sup>8</sup> EU publications, mapping and analysis of CAP strategic plans - assessment of joint efforts for 2023-2027, available at <https://op.europa.eu/en/publication-detail/-/publication/80d12120-89bc-11ee-99ba-01aa75ed71a1/language-en>



Marchauen Nature Reserve in Marchegg, Austria.  
200-hectare freshwater wetland and floodplain.  
© Wetlands International

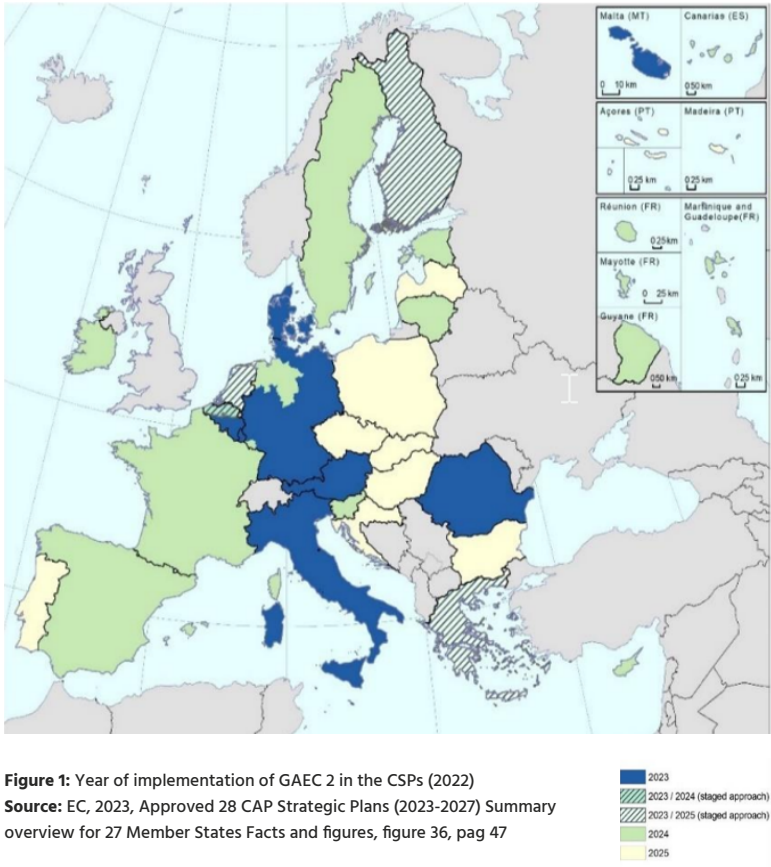


## 2. Assessment of implementation in Member States

The following sections summarise and analyse the information provided, highlighting how GAEC 2 is applied and the challenges faced in its enforcement.

### Year of implementation

The CAP Strategic Plan Regulation<sup>9</sup> allowed Member States to delay its application to 2024 or 2025 in case they can demonstrate that they need more time for establishment of management systems. As a matter of evidence, only 12 Member States were to start implementing GAEC 2 in 2023, with another 8 scheduled to follow in 2024 and the remaining 8 in 2025 (see figure 1 for details).<sup>10</sup> The primary reasons for these delays were insufficient data and incomplete mapping of relevant areas. While these delays were officially justified by the need for better mapping and data collection, in practice, they allowed Member States to adjust their approach—ultimately weakening or circumventing GAEC 2’s intended protections.



Year of implementation*	Country**
2023	AT, BE, DE, DK, EL, FI, IT, LU, MT, NL, RO
2024	CY, EE, ES, FR, IE, LT, SE, SI
2025	BG, CZ, HU, HR, LV, PL, PT, SK

\*Year of application updated with 2025 analysis. \*\* The full names of the countries can be found in Annex I



### Among the last to apply GAEC 2:

- Ireland was initially set to implement GAEC 2 in 2024, but this was postponed to January 1st, 2025. As of March 2025, an agreement on the details between Ireland and the European Commission has not been reached. According to the second amendment to Ireland’s CAP Strategic Plan 2023-2027, the delay was needed to develop a management system, improve area mapping, and ensure effective implementation of standards.<sup>12</sup> While the Environmental Pillar<sup>13</sup> initially supported the delay, recognizing the need to address issues with definitions, maps, and thresholds, further postponements do not seem to be justifiable. Although updated maps were published in 2024, when it became clear that the new map would identify a larger area of organic soils requiring protection under GAEC 2, the Irish authorities decided to revert to the outdated map instead.
- France has yet to implement GAEC 2. A new monitoring committee has been established in October 2024 to work on this GAEC. Efforts are underway to develop a new mapping approach for wetlands, but concerns have been raised about the methodologies being employed. Specifically, the scope of the current approach does not adequately cover most wetlands and peatlands, with less than 1% of agricultural land protected compared to 5% of land that actually consists of wetlands. Additionally, focusing on Ramsar sites as a key target is seen as a misjudgment, as it does not align well with the specific nature and protection needs of these internationally recognized areas in France.<sup>14</sup>
- Poland was set to implement GAEC 2 from January 1st 2025, but it was not until March 2025 that the Ministry of Agriculture published a map of the agricultural land covered by the standard. Additionally, a significant shortcoming has already emerged with a change of the peatlands and wetlands in scope. Originally, the Polish CAP Strategic Plan stipulated that the standard would cover soils with at least 30% organic matter content. However, at the end of 2024, the Ministry of Agriculture and the Monitoring Committee decided to raise this threshold to 60%, a level typically associated with relatively undisturbed peatlands. As a result, GAEC 2 would have applied to only about 146,000 hectares, compared to the 900,000 hectares of drained peatlands under agricultural management in Poland and 600,000 when using the threshold of organic matter content  $\geq 30\%$ . Following protests from environmental NGOs and the State Council for Nature Conservation, the threshold was revised to 40%, extending coverage to approximately 400,000 hectares.
- Bulgaria was also set to implement GAEC 2 from January 2025. However, in mid-March, the Ministry of Agriculture proposed a revision to GAEC 2, which would ease management measures for the protection of wetlands and peatlands. The proposed amendments faced opposition from nature protection NGOs and the Ministry of Environment, and the outcome remains unclear.

<sup>9</sup> Regulation - 2021/2115 - EN - EUR-Lex. <sup>10</sup> EU publications, mapping and analysis of CAP strategic plans - assessment of joint efforts for 2023-2027, available at <https://op.europa.eu/en/publication-detail/-/publication/80d12120-89bc-11ee-99ba-01aa75ed71a1/language-en>. <sup>11</sup> EC, Approved 28 CAP Strategic Plans (2023-2027), available at CAP Strategic Plans - European Commission. <sup>12</sup> Freiberg, 2024, Engagement 'ongoing' on GAEC 2 to protect peat soils, available at Engagement 'ongoing' on GAEC 2 to protect peat soils - Agriland.ie. <sup>13</sup> The Irish Environmental Network (IEN) is a coalition of environmental NGOs in Ireland that work together to promote environmental protection and sustainability. It supports its member organizations through advocacy, funding, and policy engagement, particularly in areas like biodiversity, climate action, and sustainable land use. The IEN often collaborates with the Irish government and the EU on environmental policies, including those related to the Common Agricultural Policy (CAP) and GAEC (Good Agricultural and Environmental Conditions) standards. <sup>14</sup> Ramsar sites are selected for their international importance, not as a comprehensive map of all wetlands or peatlands. Many valuable areas, including some peatlands, may not meet the Ramsar criteria or have not been assessed, leaving them outside the designation. Relying solely on Ramsar sites for GAEC 2 implementation misses a significant portion of important carbon-rich ecosystems that need protection.





## Mapping

As mentioned above, Member States were permitted to delay the implementation of GAEC 2 to allow time for developing accurate maps of peatlands and wetlands. While most now report that mapping has been completed, responses indicate that many key areas remain excluded: 12 respondents stated that the mapping has been finalised in their countries, but only around half confirmed that all relevant peatlands and wetlands are covered.

Wet meadows. © Wiesław Król



Extensive grazing on wet meadows.  
© Tomasz Wilk

Several discrepancies in mapping have been reported across Member States:

- Austria: The inventory released in February 2022<sup>15</sup> was done on best-available data on soils and peatlands. Further research released in February 2025<sup>16</sup> indicates that the area of organic soils could be at least 30 percent higher. National peatland inventory (mire-catalogue) is currently being revised and should be available 07/2025.
- Belgium: a probability map for peat has been created, with plans to verify on-site whether peatlands are present. Until this process is completed, no additional protection will be introduced.
- Estonia: while mapping exists, they are outdated and require revision.
- France: wetland inventories cover only 65% of the national territory, and the peatland inventory is still being finalised (expected completion in 2026).
- Hungary: Mapping has been completed but remains imperfect, as not all wetlands on arable land are included.
- Italy: Large wetlands are generally included, but smaller, localised wetlands and upland peat bogs remain excluded. While some regional mappings exist, there is no national catalogue of wetlands and peatlands deserving protection under GAEC 2.
- Lithuania: Two databases exist, but neither provides a comprehensive picture. One database, based on an older soil inventory, estimates peatland coverage at 10% of the country, while another, used for GHG accounting, underestimates peatland extent by around 30%.
- Poland (mentioned above): The applied definition (minimum 40% organic matter) significantly limits the mapped area, reducing coverage from expected 900,000 hectares to just 400,000 hectares.
- Ireland (mentioned above): A newly funded mapping project would have expanded the area requiring protection, but authorities opted to retain an outdated map to limit GAEC 2's scope.

These mapping discrepancies have allowed Member States to significantly narrow down the area covered by GAEC 2, ultimately undermining its effectiveness in protecting peatlands and wetlands.

<sup>15</sup> Feuchtgebiete, Torfläichen und Moor- bzw. Feuchtschwarzerdeböden auf Basis FGI (Feuchtgebieteinventar). 2022. Bundesministerium für Land- und Forstwirtschaft, Klima- und Umweltschutz, Regionen und Wasserwirtschaft.<https://geometadatensuche.inspire.gv.at/metadataensuche/srv/api/records/fc03acd9-f640-4db2-a0c2-6e2e1ac711fb>. <sup>16</sup> 'Organische Böden In Österreich: Ausmaß, Bewirtschaftung und Treibhausgasemissionen'. 2025. Bundesministerium für Klimaschutz, Umwelt, Energie, Mobilität, Innovation und Technologie (BMK). <https://www.umweltbundesamt.at/fileadmin/site/publikationen/rep0932.pdf>



## Design of GAEC 2

The main objective of GAEC 2 standard is the protection of carbon rich soils. Hence, it must be designed in a way to protect and preserve peatlands by establishing key provisions to restrict activities such as draining, plowing, and peat extraction. To assess the extent to which GAEC 2 is effective in achieving its objective across Member States, we asked national experts from our network whether certain restrictions were implemented.

In almost all responding countries, some form of restrictions or limitations have been implemented for the protection of wetlands and peatlands under GAEC 2. However, when asked whether GAEC 2 is effective or robust enough to protect these ecosystems, all respondents, except four, indicated that the design is not sufficient. Among the four, one said that GAEC 2 is effective enough (CZ), while the remaining three found that it is still difficult to assess the standard's effectiveness (EE, HR, HU).

Feedback from national experts across different countries revealed common challenges in the application of GAEC 2, which can be categorised into three main areas: drainage systems, tillage practices, and scope limitations.

## 1 Drainage system

Drainage systems in peatlands and wetlands lower the water table, causing peat oxidation, which releases stored carbon into the atmosphere and contributes to greenhouse gas emissions. This process leads to soil subsidence, increased drought and flood risks, and loss of biodiversity by altering natural wetland ecosystems. Additionally, drainage can degrade water quality by increasing nutrient runoff, further impacting surrounding environments.

An assessment carried out by the European Commission between 2022 and 2023<sup>17</sup> reveals that 22 countries had adopted a ban or restriction on drainage systems. The questionnaire responses revealed key insights into the actual implementation of these restrictions.

**In fact, several countries have exploited loopholes to continue or renew drainage activities, hindering the robustness of GAEC 2:**

- Germany allows the renewal of drainage systems if it is necessary to maintain good agricultural status, meaning that drainage capacity can still be increased.
- Austria and Lithuania have a ban on creating new drainage systems, but permit the renewal of existing drainage systems and increasing their capacity under certain circumstances.
- Ireland is not proposing a new ban on drainage. Instead, new drainage and the deepening of drains will merely be subject to the Planning and Development Regulations 2001–2024, which only applies to a narrow definition of wetlands. These regulations do not amount to an outright ban, so in effect, Ireland is not introducing any new controls on drainage.
- Poland has a ban on both constructing and renewing drainage systems, but an interpretation by the Ministry of Agriculture clarifies that maintenance is permitted. This includes both ongoing (e.g. mowing, blockage removal) and periodic activities (e.g. desilting, shrub removal, cleaning pipes). GAEC 2 is stated not to apply to ditches and irrigation systems, which are expected to remain fully functional—effectively allowing continued drainage.

Valance Lodge, in Teesdale – part of the North Pennines. Peatland – a 900 square kilometres peatland located in England mostly made of blanket bog undergoing restoration.  
© Wetlands International

<sup>17</sup> EC, 2023, Approved 28 CAP Strategic Plans (2023-2027) - Summary overview for 27 Member States, Facts and figures, figure 37; available at 7b3a0485-c335-4e1b-a53a-9fe3733ca48f\_en





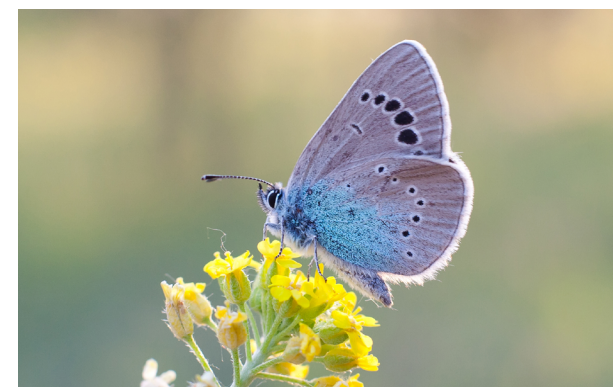
## 2 Tillage

Tillage, including ploughing, on peatlands and wetlands accelerates carbon emissions by exposing organic matter to oxidation, contributes to soil drying and erosion, and disrupts the natural water balance. Ploughing, in particular, deeply disturbs the soil, which further exacerbates these effects. Additionally, both tillage and ploughing release nutrients that can pollute nearby water bodies, threaten biodiversity by destroying habitats, and cause long-term land degradation. These practices pose significant risks to the ecological and climate-regulating functions of peatlands.

- Germany and Austria still allow tillage up to 30 cm
- Lithuania allows for shallow tillage - up to 15 cm.
- In the Netherlands, the conversion of permanent grassland into arable land is prohibited; however, it can still be renewed, which allows for ploughing.

Additionally, arable land can remain in agricultural use and may be ploughed to a depth of up to 40 cm. Initially, peat soils were to be excluded from arable use, including for crops like corn, but under pressure from the agricultural lobby and government support, this restriction was lifted.

- Ireland is only proposing a ban on deep ploughing, a practice that is already not used in the country.
- In Poland, shallow tillage (up to 15 cm) is allowed on the arable land; grassland can be cultivated every four years.
- In Spain, surface tillage is allowed on cultivated land already located on wetlands and peatlands, except in areas used for traditional rice cultivation. This exception is justified by the claim that rice farming contributes to the protection and maintenance of wetlands and their associated biodiversity. However, the conditions that need to exist in order to assume rice cropping benefits biodiversity remain unknown.



## 3 Limited scope of application

A significant concern with GAEC 2 is the limited scope of its application in certain Member States. The flexibility provided to Member States in determining the maps and criteria for identifying areas under GAEC 2 has led to an uneven protection of peatlands and wetlands. This variation in scope undermines the overall effectiveness of GAEC 2 in safeguarding these ecosystems.

- Poland tried to reduce the scope of its application by raising the organic matter content requirement to 60%, which applies to only 146,000 hectares, instead of 900,000 hectares of existing drained peatlands. Following negotiations with the European Commission, this threshold was adjusted to 40%, extending protection to approximately 400,000 hectares.
- France similarly has a limited scope, as less than 1% of agricultural land is protected under GAEC 2, compared to the actual 5% of agricultural land that consists of wetlands. Moreover, the focus on Ramsar sites for protection is criticised, as it does not adequately address the diversity of wetland types and their specific protection needs.
- Ireland: Through weak definitions, thresholds, and mapping, Ireland has narrowed the scope of protection to a subset of organic soils and mainly wetlands.
- In Spain GAEC 2 has also a limited scope. Properties of less than 10ha are exempt from monitoring the GAEC 2 compliance.

By contrast, in the Netherlands the initial scope of GAEC 2 was limited to coastal plain peat (peat soils located below 1 meter above Normaal Amsterdams Peil – NAP, approximately sea level). Since 2025, the scope has been extended to include all peat soils, broadening the area covered under the standard.

## 4 Other elements

Other elements that shed light on broader challenges in the implementation of GAEC 2 and underscore limitations that hinder its effectiveness in protecting peatlands and wetlands across Member States include:

- In Italy, the ban on peatland conversion applies only to Ramsar sites, excluding small wetlands and certain peat bog areas.
- In Austria, peatlands and organic soils cover approximately 33,000 hectares of permanent grassland and 4,000 hectares of arable land. Under GAEC 2, only less intensively used permanent grasslands—those mown up to twice a year—are included, while more intensively managed grasslands are excluded from the obligations.
- Finland requires that peatlands and areas converted to agricultural land after 2022, including those previously used for peat production, must have permanent grass cover and cannot be ploughed. Grass cover can only be renewed by direct sowing or light tillage. However, this requirement does not apply to areas created through land consolidation decisions, plots cultivable by December 31, 2022, changes improving plot shape or removing cultivation obstacles, areas bordered by existing plots, or areas smaller than 0.5 hectares or up to 5% of the basic plot area (whichever is less).
- For Belgium-Flanders there was an extra protection framework for peat under agricultural land planned in the current CAP and that was supposed to start in January 2024, which ultimately did not pass.
- Poland has implemented a ban on the conversion of grasslands into arable land. However, shallow cultivation and undersowing are allowed every four years, providing some flexibility for land management while still restricting more intensive agricultural practices.



## Enforcement and monitoring

Ensuring compliance with GAEC 2 requires effective enforcement and monitoring mechanisms. Respondents were asked how GAEC 2 is implemented, monitored, and enforced in their countries. Approaches to enforcing and monitoring compliance with GAEC 2 vary significantly, with many reporting a lack of clarity and uncertainty regarding the specific mechanisms in place. While some rely on administrative checks or remote sensing, others appear to have little concrete information about how monitoring will be carried out.



A flock of ruffs. © Wiesław Król

- In Austria, the expectation of non-compliance is low, as GAEC 2 does not significantly alter current land use on peatlands. Compliance is primarily monitored through obligatory checks on 1% of farms, with no dedicated monitoring system in place.
- In Croatia, compliance with GAEC 2 is monitored by the Paying Agency for Agriculture, Fisheries, and Rural Development (APPRRR) and the Ministry of Agriculture through administrative checks (subsidy applications, land parcel identification, and farmer records), on-site inspections (random or targeted field visits), satellite and remote sensing (using Copernicus satellite images and drones), and collaboration with environmental agencies (cross-checking with Croatian Waters and conservation experts). Non-compliance may result in the reduction or withdrawal of subsidies and possible fines under environmental regulations.
- In the Czech Republic, the public land register website includes a layer showing areas where farmers are obligated to comply with GAEC 2. However, it remains unclear whether compliance will be monitored solely by the Payment Agency (SZIF) or other state organizations.

- In Ireland, monitoring procedures are unclear at this stage. While the Agriculture Minister has suggested that checks will be done remotely, it remains uncertain, e.g., how drainage maintenance and capacity changes will be verified without on-site inspections.
- In Poland, the Ministry of Agriculture highlights on their website that farms below 10ha will not be subject to controls and sanctions associated with the implementation of conditionality, sending a clear message that small farms may disrespect the norm without consequences.
- In France, Germany, and Spain, there is a general lack of clear information regarding the monitoring and enforcement of GAEC 2. In these countries, the expectation of non-compliance is low, as GAEC 2 does not significantly affect current land use on peatlands. However, none of these countries have reported specific or detailed monitoring measures.

In conclusion, enforcement and monitoring of GAEC 2 across Member States is fragmented, with significant uncertainties about implementation. The lack of robust monitoring systems, coupled with GAEC 2's limited impact on land use, suggests that its effectiveness may be compromised. Despite this, the need for thorough monitoring remains crucial to ensure the standard's success, though many respondents express uncertainty about its practical application.

## Challenges and barriers for implementation

Beyond the challenges already mentioned, we asked respondents to identify specific barriers faced by both managing authorities and farmers in implementing GAEC 2. From the managing authorities' side, one key element is the conflict between agricultural and environmental perspective; GAEC 2's goals are perceived as a barrier to agricultural production, which led to limited communication about the benefits of the standard for both ecological and agricultural stability. In this regard, it was highlighted how original restrictions were softened due to pressure from agricultural interests focused on maintaining production levels.

From the perspective of farmers, key challenges include limited access to clear information and resources, as well as last-minute communication, which has made it difficult for them to plan ahead and adapt their practices. A cross-cutting issue is the lack of adequate information and educational campaigns about the objectives and significance of GAEC 2. This gap has allowed space for speculation, the spread of disinformation (e.g. that the EU will flood agricultural land), and misinterpretation—contributing to confusion

about the actual impact of GAEC 2. Additionally, advisory services are often under-resourced, making it particularly difficult for older farmers, who may struggle to access and navigate online platforms to understand their responsibilities.

There are also practical problems, such as the difficulty of marking the edges of peatlands and wetlands, which often have uneven shapes and are hard to spot clearly in the field. In Poland, one issue is that the mapping did not match up with land ownership boundaries, which made the maps confusing and showed a mix of areas that do and do not meet the rules. On top of that, it is hard to move away from traditional farming methods because new options, like paludiculture, do not have enough support or financial rewards yet.

Another major issue is that authorities have not communicated well with farmers about the new rules. As a result, some farmers are unsure of what is expected of them. This can lead to fines or a loss of subsidies if they are inspected unexpectedly or monitored by satellite.



### 3. Conclusion and Policy Recommendations

**Wetlands and peatlands are indispensable allies in the fight against climate change and biodiversity loss. Their protection and restoration are also crucial for stabilising agricultural activity in an era of increasing drought and more frequent extreme weather events. Their inclusion under GAEC 2 in the CAP 2023–2027 represents a positive and much-needed step forward in delivering on climate and environmental objectives while also supporting farmers in adapting to the impacts of climate change. By including these ecosystems within the conditionality framework, the CAP now provides a clear basis for Member States to ensure their protection.**

**H**owever, without clear communication, robust implementation and enforcement, this tool risks falling short of its potential to halt the degradation of these ecosystems and support their sustainable management. The current state of implementation across Member States reveals a troubling pattern of delay, weak enforcement, and significant limitations in scope. While the regulation provides a solid foundation, its effectiveness is being undermined by inconsistent definitions, incomplete mapping, and loopholes in national application. There is now a growing risk that instead of building on this progress, the new simplification package and the future CAP post 2027 could result in the standard being weakened—undermining both its environmental impact and its credibility.

This would be a step backwards and not in the interest of farmers. The CAP has, for the first time, created a mechanism that can anchor wetland and peatland protection in agricultural policy, increasing thereby the complementarity with other EU objectives and strengthening the functioning of water cycles in agriculture fields. The focus now must be on improving its implementation—not considering a retreat from its implementation. To fully harness the potential of this policy, it is essential that a meaningful standard remain embedded in EU legislation and protection efforts remain coordinated at the EU level. This should include incentives for the sustainable management of peatlands under the CAP, as well as restoration measures that contribute to the objectives of the Nature Restoration Regulation. Fragmenting the policy at the national level would lead to inconsistent application and undermine its effectiveness. With the necessary tools already in place, Member States should be supported and encouraged to clarify, operationalise, and enforce GAEC 2 in a way that meets the EU's climate and biodiversity targets.

### Policy recommendations:

#### 1 Ensure comprehensive mapping and robust application of GAEC 2

Member States should ensure that the mapping and requirements under GAEC 2 effectively protect carbon-rich soils used for agriculture. This aligns with the core objective of GAEC 2 and contributes to achieving the climate and environmental goals of the CAP. Clear, consistent definitions, effective mapping, and enforcement are crucial to ensuring the protection of these valuable ecosystems.

#### 2 Establish a comprehensive “no degradation” principle

Introduce a comprehensive “no degradation” principle as a mandatory baseline for all CAP Strategic Plans. This should include a ban on the creation of new drainage systems, renewal or deepening of existing drainage infrastructure, expansion of pumping capacity in polder areas, deep ploughing, and uncontrolled burning on peatlands. This minimum protection should be progressively enhanced into “effective protection” through targeted requirements—such as raising water levels, converting arable land to wet grassland or paludiculture, and investing in infrastructure for water retention and regulation (e.g. minimum water level thresholds and reservoir targets).

#### 3 Introduce targeted support for sustainable peatland and wetlands management and restoration

Member states with a high proportion of drained organic soils under agricultural use should be required to offer dedicated eco-schemes or agri-environment-climate schemes that support sustainable peatland management - particularly through rewetting and paludiculture and sustainable wetlands management

under wet farming activities (e.g. Control rotational and extensive grazing, helophyte mowing regimes to diversify plant communities and with a secondary use of biomass in livestock and agriculture). These schemes should include long-term financial incentives that reflect the public goods provided by farmers and should be complemented by long-term, systemic measures to ensure the lasting success of peatland and wetlands restoration efforts.<sup>18</sup> In some countries, such as the Netherlands, options are being explored to use payments under Areas with Natural Constraints (ANC) to support peatlands with elevated water levels—an approach that could offer additional flexibility and should be further encouraged where relevant.

It is also crucial to ensure that paludi-crops (crops for paludiculture) are eligible for CAP payments, as this is not always guaranteed under current frameworks. At the same time, any subsidies that do not support the sustainable management of peatlands should be phased out to avoid contributing to further degradation. Instead, targeted and adequately funded support for sustainable peatland and wetland management should be introduced.

Moreover, the CAP should be leveraged to support Nature Restoration Regulation (NRR) targets, providing a systemic framework that helps achieve broader environmental objectives for peatland and wetland restoration.

#### 4 Strengthen advisory and knowledge support system

Step up public and independent advisory support to help farmers adopt agro-ecological practices, with a focus on sustainable management of peatlands and wetlands across Europe. These advisory services should enable farmers to adapt to the increasing challenges posed by climate change, as well as the biodiversity and pollution crises.

<sup>18</sup> Joint statement on simplification packages affecting EU agriculture and food, Dismantling environmental rules will hinder, not help farmers: Invest in their resilience, available at 60 NGOs warn that simplified rules will hinder, not help, farmers' resilience | WWF



# Annex 1

## Country codes

AT	Austria
BE	Belgium (BE-FL for Flanders; BE-WA for Wallonia)
BG	Bulgaria
CY	Cyprus
CZ	Czech Republic
DE	Germany
DK	Denmark
EE	Estonia
EL	Greece
ES	Spain
FI	Finland
FR	France
HR	Croatia
HU	Hungary
IE	Ireland
IT	Italy
LT	Lithuania
LU	Luxembourg
LV	Latvia
MT	Malta
NL	Netherlands
PL	Poland
PT	Portugal
RO	Romania
SE	Sweden
SI	Slovenia
SK	Slovakia



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Back Cover: Atlantic puffins, © Shutterstock



Marchauen Nature Reserve in Marchegg, Austria.  
200-hectare freshwater wetland and floodplain.  
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