



EURAF's Comment on the Commission's "Vision for Agriculture and Food"

EURAF is deeply disappointed that the Vision for Agriculture and Food ([19.2.2025 COM\(2025\) 75 final](#)) does not mention agricultural trees or agroforestry. This demonstrates that some policymakers continue to view agriculture and forestry in separate siloes, with agricultural trees falling through the gap between them. Extensive research, coupled with the on-the-ground practices of our members across Europe, backs up our claim that **agroforestry has a vital role in helping meet the goals of the Vision's and relevant EU policy initiatives** on resilient ecosystems (Nature Restoration Regulation), maintenance of soils (Soil Monitoring Directive), fight against pests and diseases, pollination of crops, water quality and availability (Water Resilience Strategy), clean air and climate conditions (EU Climate Adaptation Plan, National Climate and Energy Climate Plans, LULUCF Regulation).

It is also unfortunate that there is no mention of the EU Nature Restoration Regulation, that will significantly impact the agricultural sector in the EU, and the Commission's 3 Billion Trees Initiative or the repeated failure of Member States to meet tree planting targets in the current and previous CAP Programmes. In spite of the recognition of high-level experts panels, such as the 'European Scientific Advisory Board on Climate Change'¹, the omission of agroforestry in the Vision implies that its potential to contribute to the 2040 climate targets, to resilient and biodiverse farms and ecosystems is still insufficiently recognised.

Also, the Commission should commit to delivering on previous policies which have been neglected. These include the Farm Sustainability Platform, the GreenData4All Initiative and compliance by Member States with the almost twenty-years-old INSPIRE Directive (2007/2/EC) for open access to geospatial data linked to public funding. While we acknowledge the Vision's limitations, especially concerning agroforestry and trees outside forests, we have identified crucial areas where our expertise can be leveraged to support its implementation.

Priorities in the Vision are shown in bold below together with EURAF comments:

1. The **limited availability of fertile land** is highlighted in the Vision. Well-designed agroforestry systems can significantly contribute to a more sustainable farming model by protecting and enhancing soil fertility

¹ A [recent report of the Board recognises agroforestry among the most promising](#) solutions to achieving EU's emissions targets.



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through enhanced nutrient cycling without compromising crop/pasture or livestock productivity. In addition, trees can provide multiple ecosystem services as well as tree products (e.g., timber, fruits, nuts), which can substantially diversify farm income.

2. EURAF welcomes the **Farm Sustainability Compass** and its intention to streamline reporting and reduce administrative burdens for farmers, allowing them to monitor and record sustainability data only once, while gradually adopting more sustainable practices and attracting new sources of financing. EURAF sees the Sustainability Compass as built around the CAP Land Parcel Information System (LPIS), with data on agricultural trees and landscape features collected at a scale where tree planting initiatives and nature based solutions implemented by individual farmers can be rewarded and integrated into future **carbon farming schemes**.
3. EURAF suggests that the **EU Observatory on Farmland** should also be based on the CAP Land Parcel Identification system, extended to include forest parcels, and also agricultural areas which are too small to be covered by the CAP. The CAP LPIS is the best land use registry, of its kind, in the world, but is marred by differences in data-access between Member States and by lack of consistency in the data collected. The LPIS is vital to provide ground-truth for remote sensing information (therefore essential for quantifying the extent of agroforestry systems), yet is not mentioned in the Vision.
4. We are willing to contribute to the discussions in relation to **Nature Credits**. We support the mention of inconsistencies between existing standards and monitoring indices. To these inconsistencies we add the unnecessary differences in metrics used for monitoring the CAP and the Nature Restoration Regulation (NRR). The **Common European Agricultural Data Space** has to help in collecting and harmonising the data needed.
5. The Vision's emphasis on **advanced digital technologies** is welcome and will help plan the response of agriculture, forestry and the food system to future challenges. EURAF works on several relevant Horizon projects², and is producing tools which can be used by Member States when planning agricultural and forestry incentives and evaluating their impacts.
6. EURAF also welcomes plans for a **toolbox of tailored measures to support the sector and regions in their efforts to reduce emissions**. We have developed models and maps to show the regions and areas where "tree deserts" exist, and where even small areas of tree planting or woodland restoration can have the biggest benefit.
7. The emphasis on **renewable energy production in agriculture** is also welcome, and trees on farms may be incorporated into agrivoltaics systems and/or produce biomass for small-scale/local energy mix (e.g. energy communities). Wood chips and biochar may also be generated, while diversifying the landscape and biodiversity.
8. The upcoming **harmonisation of CRCF methodologies and verification rules**, together with completion of the carbon farming parcel-based geospatial registry by 2028, will open the door for the launch of an AFOLU Emission Trading System, and it is disappointing that this is not mentioned in the Vision. It will be needed for the possible extension of energy accounting to agriculture and forestry imports via the EU Carbon Borders Adjustment Mechanism (CBAM).

² DigitAF, DISTENDER, CREDIBLE, ResAlliance, Carbon Farming Med, DeepHorizon.



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9. **Long-term support for the livestock sector, with an emphasis on traditional extensive grazing and animal welfare** is welcome, but we note that most of these systems depend on silvopastoralism, and Member States have done little to support this historic practice in recent CAP programmes. EURAF's "[Brno Declaration](#)" called for 11.2 million ha of new agroforestry, of which 2 million ha is for new silvopastoralism, plus greater support for restoring existing parkland systems. We also hope for an emphasis on DELIVERING the Commission's plans for 3 billion additional trees by 2030.
10. The emphasis on **building an ambitious investment agenda** and the **one health approach** is welcome, but EURAF has been lobbying for several years for agroforestry and sustainable agriculture to be included in the **Sustainable Finance Taxonomy**, with no apparent movement. Agroforestry and nature based solutions to climate change have a major role to play in the EU's Proposed **Competitiveness Compass**, and private investment should be encouraged.

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