



Brussels, 1 September 2011

RE: Inter-Service Consultation on CAP reform: concerns that greening of the CAP is being jeopardised and losing environmental focus

Dear Commissioner,

We, the undersigned organisations, are writing to express our serious concerns about recent reports suggesting that the legislative proposals for the Common Agricultural Policy (CAP) 2014-2020 have reneged on promises, as set out by the European Commission in its Communication of 18 November 2010, to make the reformed CAP “greener”. The upcoming Inter-Service Consultation provides you with a chance to ensure the proposals will deliver on the promises made and respond to important environmental challenges. We urge you to ensure that the CAP reform proposal that results from the inter-service consultation is more robust and genuine in its attempt **to make European farming more environmentally beneficial**.

We appreciate that Commissioner Ciolos (who has also received a copy of this letter) and the whole European Commission have expressed the will to use the current CAP reform to ensure a sustainable future for European agriculture which will deliver essential **public goods**. However we want to remind you that ambitious steps are necessary to ensure this goal. **Long term food security** can only be achieved if we move towards resilient food and farming systems. This means tackling the over-dependence of our agricultural systems on external inputs and halting negative impacts on the environment at home and abroad. Farming will play a key role in ensuring that the European Union’s **biodiversity, water and climate goals** will be achieved and the introduction of strong and effective measures during this CAP reform will be crucial to enable us to achieve these goals.

In times of austerity and budget constraints in all Member States, a new CAP is obliged to set priorities and show it can deliver towards these. A CAP which is only a green washed continuation of the old system of direct payments is not the right answer to the current crisis. It will not lead to long term resilience for European food and farming and will not be accepted by European Citizens. We are alarmed by recent information suggesting that the current draft legislative proposals foresee as part of pillar I, **greening measures that are almost irrelevant** and will not create any genuine environmental improvement of farms. Moreover, we are worried that Pillar II will **not deliver enough for the environment** if there is no clear obligation set out to use a significant part of the budget for agri-environmental measures.

Civil society and particularly environmental NGOs have so far strongly defended the CAP budget, recognising its undoubted potential to contribute to the protection of the environment, as well as a safe, healthy and dynamic farming sector in Europe. However, this support is based on the assumption that reform will provide effective environmental outcomes and does not end up as a mere green washing of the CAP.

We therefore stress the importance of a strong and meaningful ‘greening’ of both CAP pillars for Europe’s environment and for the future of European farming as a whole.



Instead of playing productivity against sustainability, we need to support those farmers and farm systems that can deliver multifunctional benefits, including climate mitigation and adaptation, biodiversity protection, healthy soil, clean water delivery, reducing pesticide dependency, food security and rural diversity.

Our organisations believe that the CAP reform is a chance to renew the support of European Citizens by shifting public support to the delivery of defined objectives, **leading to truly sustainable food and farming systems**. Recurring food crises have shown that the dangers and vulnerabilities of industrial farming’s dependence on inputs such as nitrogen fertiliser and pesticides, as well as protein feed imports are very real. **The European Union cannot afford to wait for the next reform to make the changes which are already long overdue. The time for real reform is now.**

We have enclosed a short briefing outlining the minimum requirements that are crucially needed for what we consider to be an honest green reform of the policy.

We will contact your office shortly to discuss and clarify the latest proposals and recommendations which are also outlined below.

Yours sincerely,

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ANNEX: MINIMUM AND CRUCIAL ELEMENTS FOR AN HONEST GREEN REFORM OF THE CAP.

PILLAR I

A strict enforcement of existing environmental laws, with the polluter pays principle being a minimum condition for all farmers receiving payments under both Pillars of the CAP. In this respect, the Water Framework Directive and the sustainable use of pesticides directive should be included in Cross Compliance. Pillar I payments must only provide added incentives and benefits for farmers who undertake additional greening.

Meaningful greening component applied as a package that all farmers have to apply

- a) 10% of each farm’s surface managed as an environmentally focused area –Scientific evidence shows that one tenth of the farm area dedicated to environmental protection delivers significant biodiversity improvements and is an essential tool in combating certain pests. Several analyses show that such an obligation would not harm farmers’ incomes and is perfectly feasible in all farming systems.
- b) Effective crop diversification and rotation including legumes – This means combating monoculture by introducing mandatory crop rotation with a minimum requirement at farm level of at least four crops, from different botanical families, one of which should be a leguminous crop, and the principal crop not being more than 50% and the minor crops not being less than 15% of the farmed area. This would not only improve soil quality and tackle climate change, but would reduce the use of fertilisers, reduce risks for Europe’s livestock farmers from increases in feed prices, and reduce our contribution to high rates of deforestation in South American rainforests due our imports of soy animal feed.
- c) Soil cover –Soil should not be left bare for more than 5 consecutive weeks in either arable land or permanent crops. This can be met through optimisation of crop rotation (between spring and autumn crops), by leaving stubbles over the winter, and by planting catch crops or cover crops or by allowing native vegetation cover.
- d) Delivery of nutrient balance on the farm – This measure will ensure that there is a better balance between the nutrition in the form of fertilisers, pesticides and feeds going into a farm and the nutrients excreted from it.

High Nature Value farming and pasture top-up payment

High Nature Value farming systems are crucial for biodiversity and for tackling other environmental problems. They are, typically, extensive grazing systems or systems with closed cycles so that farmers feed their animals from sustainably locally-produced feed without relying on imported South American soy. But High Nature Value farming systems are threatened by abandonment and intensification. Focused support through the CAP is required if they are to survive and so continue providing these benefits.



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In particular, permanent, extensively-managed pastures are essential for the long-term sustainability of food production, biodiversity conservation, water quality and resilience to climate change. Measures to protect pastures exist already within cross-compliance, but these measures are not sufficient or effective. Incentives are needed, not more rules. We therefore propose that farmers who preserve permanent extensive pastures without ploughing and reseeded and who manage their pastures in an environmentally-friendly way, should be supported by payments from the first pillar. These payments must be sufficient to incentivise farmers to continue to farm semi-natural grassland systems or move towards well-managed pasture/grassland systems.

Cut-off dates must be set in the past, in order not to trigger a wave of pasture destruction at the release of the proposal.

This will require improved definition of permanent pastures, in order to:

- exclude renewed short-term grass leys which are currently considered permanent grassland but do not deliver the environmental benefits associated with semi-natural permanent pasture;
- include the significant areas of Europe’s permanent grazing land that are among the most productive in terms of ecosystem services, but are not eligible for Pillar I payments owing to the presence of shrubs and trees.

Payments for organic farmers

Organic farming has proved its positive effects for the environment. Pillar I should provide higher payments to organic farmers than conventional farmers.

Natura 2000 top-up in Pillar I

Natura 2000 represents Europe’s most valuable land in terms of the environment. These areas require specific management by farmers. In order to encourage farmers in this network to manage their land appropriately and to reward them for their actions, we need to show this in the new CAP by giving a higher Pillar 1 payment to farmers who are obliged to comply with Natura 2000 management prescriptions.

PILLAR II

Pillar II is the pillar that can deliver the most targeted, most well-designed, multi-annual programmes that deliver on the many objectives of the EU. We must ensure that Pillar II gets strengthened in environmental terms in order to live up to expectations and to deliver the desired results on the ground.

The following points should be taken into account in the reform of Pillar II:

- Clear incentivisation and prioritisation of the environment through both the architecture and the co-funding rates;
- Ring-fencing of payments for agri-environment schemes. Assuming that the intention is to move away from the current axis structure towards an objective-driven policy, a new mechanism must be brought in to replace the current minimum spending for the environment;



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- Greater assistance given to advisory services, and mandatory coverage of environmental issues by advisory services, including grants for local partnership projects involving farmers;
- Coherence of all RD measures regarding environmental objectives must be guaranteed through the inclusion of clear safeguards on non-environmental measures;
- Farmers should be encouraged to convert to and maintain organic farming by specific measures;
- Investments related to Organic and HNV farming are prioritised;
- Special agri-environmental measures related to the Water framework directive (WFD) should be designed for those measures which are necessary to encourage farmers to make special investments which are needed to reach the objectives of the WFD;
- Emergency payments to support and maintain environmentally beneficial livestock farming in disadvantaged areas based on the public goods they provide;
- Incentives to encourage low intensity livestock farming included in agri-environment payments / special schemes for good environmental outcomes from livestock farms included in agri-environment schemes;
- The recognition of protected areas in the provision of public goods;
- Specific encouragement of biological control as a tool to reduce pesticide dependency;
- Objectives should be spelled out to ensure that the Member States' plans and evaluations will be sufficiently strong. For example:
 - o Water objectives must clearly refer to achieving good status of all river basins under the Water Framework Directive.
 - o Biodiversity objectives must clearly refer to implementation of the Birds and Habitats Directives and achievement of favourable conservation status of Natura 2000 habitats and species.
 - o Climate objectives must clearly refer to effective greenhouse gas emissions reductions and ecosystem based adaptation and payments for farming that undertake climate mitigation measures. These measures must take into account entire life cycle emissions, including for example second order emissions from feed usage for intensive livestock farms. They must also recognise soil carbon storage potential of grass based systems.
 - o Resource efficiency objectives must also cover the crucial problem of the dependency of imported proteins.
 - o Coherence between the different goals.

The global environmental consequences of feed production and imports require special attention

Specific policy measures supporting local and regional feed production in the livestock sector as well as mixed livestock systems are required. Ensuring that more of the nutritional needs of livestock are provided by the farm's own land can be achieved by setting clear thresholds for on farm feed production.