

# LIVING LAND

REFORMING EUROPE'S COMMON AGRICULTURAL POLICY



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## THE COMMON AGRICULTURAL POLICY

### INEFFICIENT POLICY

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Most of its budget is funding practices that damage nature

### POOR CONCEPTION

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Many of the Greening Measures are effectively 'green washing'

### HELP US REFORM IT

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Join the coalition and fill the Public Consultation

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# RESPOND TO THE PUBLIC CONSULTATION



The European Commission's online *Consultation on modernising and simplifying the Common Agricultural Policy (CAP)* is open to public responses from 2 February to 2 May 2017. You can respond to the consultation by filling out the response form on the [consultation website](#).

We strongly encourage individuals and organisations, from a wide range of sectors and communities across the EU to participate in this consultation and tell Europe's leaders that the CAP is broken and that we need a sustainable food and farming system. This is a hugely important opportunity to have your voice heard and influence future legislation.

The consultation questionnaire consists of multiple choice questions and open questions. To help you, we have prepared our own recommended responses to the consultation and have outlined our rationale for these recommendations. You are free to use our recommendations in their entirety or simply to inspire your own responses. You may also find our [Frequently Asked Questions \(FAQ\)](#) and [Resources](#) sections helpful in formulating your responses.



## QUESTION 1

“ Which are the most important challenges for EU agriculture and rural areas?

## OUR RECOMMENDATIONS

We **strongly recommend** selecting the following responses:

- Fair standard of living for farmers
- Pressures on the environment and on natural resources
- Climate change (mitigation and adaptation)

We are **neutral** on the following responses:

- Adaptation to trends in consumer/societal demands
- Lack of jobs and growth in rural areas
- Uneven territorial development throughout the EU

## OUR RATIONALE

Climate change is one of humanity's greatest challenges, and changing the CAP to achieve a sustainable food system will be a 'game changer' for Europe's emissions. Currently, agriculture is the biggest driver of biodiversity decline in Europe. Nothing less than a drastic overhaul will change this worrying fact. Obviously, there are further challenges (e.g. a fair standard of living for farmers) which we believe should be addressed by giving farmers support to engage in the transition to truly sustainable farming.

## QUESTION 2

“ Which of the current CAP policy tools are best suited to meet the challenges identified above?

## OUR RECOMMENDATIONS

We **strongly recommend** selecting the following responses:

- Support for Rural Development environment and climate actions in agriculture and rural areas



- Regulatory approaches (such as standards and rules)

We are **neutral** on the following responses:

- Support for Rural Development investments in physical and human capital in agriculture and rural areas
- Trade measures
- Support for integration into producers' organisations

We recommend **avoiding** the following responses:

- Decoupled payments to farmers
- Coupled support
- Market safety nets (e.g. market intervention)
- Risk management schemes

## OUR RATIONALE

We call for a major reform of the CAP and its tools. We believe that the policy needs to move from outmoded and non-targeted 'decoupled payments' to modern 'incentives' to deliver benefits for wider society. These would reward farmers for the public goods they can deliver, such as climate action and the conservation of wildlife on their farmland. At the same time enforcement of existing legislation and standards are a basic approach to any type of sustainable land management that respects commonly-agreed rules.

## QUESTION 3



To what extent does the current CAP successfully address these challenges?

## OUR RECOMMENDATIONS

We **strongly recommend** selecting the following response:

- Not at all

We recommend **avoiding** the following responses:

- To a large extent
- To a fairly good extent
- To some extent only



## OUR RATIONALE

Evidence of the CAP's multiple failures is well documented: e.g. farmers are largely dissatisfied and a significant number of them struggle to make a living;

several of its environmental claims have been proven to be false; and the push for ever further industrialisation of production is having an impact on how animals are treated. While there have been certain improvements, the current basic payments system unfairly distributes payments, contributes to high land prices which prevent new farmers from accessing land and barely discriminates between irresponsible and good land management. Many of the environmental measures are in place to correct a problem created by another part of the policy. To meet the challenges facing our food and farming system, this archaic policy must become modern and fit for purpose.

## QUESTION 4

“

Which of the following do you think are the most important contributions of farmers in our society?

## OUR RECOMMENDATIONS

We **strongly recommend** leaving this response blank.

## OUR RATIONALE

We believe the CAP plays a major role in a broken system and as such needs a major overhaul. The current policy does not help a farmer to deliver the public goods that he or she could deliver. While farmers and a whole range of actors in rural areas are doing their best to deliver several of the suggested contributions, they are not getting proper support and therefore results are often unsatisfactory. Therefore, we suggest leaving this open in order to send a clear message to the Commission that we need major reform.



## QUESTION 5

“ To what extent do you agree with the following statement:

## OUR RECOMMENDATIONS

We **strongly recommend** selecting the following responses:

- Farm Income is significantly lower than the average EU income
  - **Partially agree**
- EU farmers face stricter requirements than non-EU ones
  - **Largely disagree**
  
- Farmers get a limited share of the prices consumers pay
  - **Largely agree**
- Farmers need to make heavy investments for their businesses to be viable
  - **Largely Disagree**

## OUR RATIONALE

We feel it is problematic to ask for an opinion on a matter which has a factual answer. We would prefer statistical evidence, rather than perceptions, to be the main pillar of the next reform. It can be said that farm income is lower than the EU average, but this can vary depending on whether you use the indicator 'farm household income' or 'farmer income'. It also depends on who is answering the questionnaire. It is also the case that farmers often receive a small share of the final price. However, contrary to widely-held beliefs, the EU is not faced with a high regulatory burden. In fact, Europe's existing standards are what have commanded a higher value for our products. Several countries have put these standards in place and it depends on what you look at whether one is more stringent than the other. Finally, we believe that the last question is also misleading as many entrepreneurs have to make heavy investments in their businesses, and some farmers are no exception to this. Others, in contrast, pool resources and adopt lower cost strategies to avoid being trapped in the debt and productivity cycle.



## QUESTION 6

“ Which are the most important environmental challenges faced by agriculture?

## OUR RECOMMENDATIONS

We **strongly recommend** selecting the following response:

- Protection of biodiversity

We also recommend **selecting two** of the following responses:

- Reduction of soil degradation
- Preservation of genetic diversity such as traditional/old varieties and breeds
- Reduction of water pollution
- Rationalise use of water
- More sustainable use of pesticide and fertilisers
- Decrease air pollution
- Environmental risks such as fires, floods etc.

## OUR RATIONALE

We do not believe that a future policy should address certain environmental challenges and ignore others. A modern and efficient CAP can and must meet all environmental objectives. Since biodiversity is the most overarching term (all other points need to be tackled to keep biodiversity in our water, soils and land), we suggest ticking that box and two others of your choice.

## QUESTION 7

“ To what extent does the current CAP successfully address these environmental challenges?



## OUR RECOMMENDATIONS

We **strongly recommend** selecting the following response:

- Not at all

## OUR RATIONALE

As we have mentioned in previous answers, the CAP has not delivered for biodiversity or the wider environment. Whilst there are commendable aspects of the CAP, other more influential parts of the policy result in an overall outcome which is not satisfactory at all.

## QUESTION 8

“ What are the main barriers to becoming a farmer?

## OUR RECOMMENDATIONS

We **strongly recommend** selecting the following responses:

- Low profitability
- High prices of land

We are **neutral** on the following responses:

- Lack of available land
- Land regulation
- Difficulties to access credit
- Complexity of insurance schemes
- Inheritance laws
- Taxation
- Administrative requirements
- Access to updated knowledge/technologies

We recommend **avoiding** the following response:

- Image of the sector



## OUR RATIONALE

The CAP's current 'area based payments' system leads to capitalisation of farmer support into the value of the land, driving up land prices, making it difficult to set up new farms. Low profitability of farm produce is also a considerable issue for farmers. We think that those two challenges highlight that the policy needs major reform to deliver for the average farmer. We believe that the problems of European farming are substantial and not a problem of image that can be simply solved by more propaganda.

## QUESTION 9

“ What do you see as major drivers for innovation in agriculture, forestry and the rural economy?

## OUR RECOMMENDATIONS

We **strongly recommend** selecting the following responses:

- Access to advisory services delivering farm-tailored solutions
- Support to the development of the circular economy
- New partnerships between different actors (i.e. between farmers, civil society, researchers...)

We are **neutral** on the following responses:

- Access to vocational training and relevant information
- Dissemination of knowledge
- Financial /investment incentives / support for innovative projects
- Support for adjusting to new societal demands (i.e. nutritional guidelines)
- Better involvement of producers throughout the value chains (up until the consumer)
- Research and the provision of knowledge targeted to farmers' needs

We recommend **avoiding** the following response:

- New technologies and agricultural inputs



## OUR RATIONALE

Innovation is important but it must go beyond new technologies and agricultural inputs (which is why we recommend avoiding this response entirely) to include smart ways of improving the sustainability of the overall system. That is why emphasis has been put on advice, new partnerships and the circular economy as an important way to reach our sustainable development goals.

## QUESTION 10

“

Since 2003, the Farm Advisory Service (FAS) aims at helping farmers to better understand and meet EU rules and good agricultural and environmental conditions. How would you characterise the current situation of the FAS in your respective territory, as regards...

## OUR RECOMMENDATIONS

We **strongly recommend** selecting the following responses:

- Availability of advice
  - **Not satisfactory**
- Access to advice
  - **Not satisfactory**
- Quality of the service provided
  - **Not satisfactory**
- Independence of advisors
  - **Not satisfactory**
- Transfer of knowledge
  - **Not satisfactory**
- Dissemination of new knowledge
  - **Not satisfactory**

## OUR RATIONALE

While not a highly contentious part of the policy, we feel that the Farm Advisory Service needs to be one of the key catalysts of the transition to new models of farming and be the information hub which shows farmers these options. So far, to our knowledge, this aspect is severely lacking in several countries. We are also particularly worried about the independence of farm advice provided by companies that also sell inputs to farmers, such as fertilisers or animal feed.



## QUESTION 11

“ To what extent did recent CAP reforms pay sufficient attention to Policy Coherence for Development?

## OUR RECOMMENDATIONS

We **strongly recommend** selecting the following responses:

- Overall coherence with EU Development Policy and Humanitarian Action
  - **To some extent only**
- EU exports to developing countries
  - **To a fairly good extent**
- EU imports from developing countries
  - **To some extent only**
- Impact on local agricultural production in developing countries including land-use change
  - **Not at all**
- The availability and affordability of agricultural goods in developing countries
  - **To some extent only**

## OUR RATIONALE

It is very good to see that policy coherence for development has been included in the consultation. Over time, the CAP has reduced the direct negative impacts of overproduction exports (dumping) to developing countries, but there are still many parts of the food system that remain unaddressed, such as the massive imports of unsustainably-produced commodities to feed our livestock. Further, we are currently observing a heavy emphasis on export-led agricultural growth objectives, which can become hugely problematic for non-EU countries.

## QUESTION 12

“ What are the main problems/obstacles preventing the current policy from successfully delivering on its objectives? What are the drivers behind these problems?



## OUR RECOMMENDATIONS

This is an open question. We **strongly recommend** the following response:

- We believe that the main barrier to real reform lies in the current decision-making process around the CAP. The current process is bogged down by vested interests stifling reform. To achieve real reform, we need stronger voices in the debate from sectors other than agriculture: notably environment, but also climate, development, etc. We advocate joint ownership of the next CAP, from the EU level (involving several Parliament committees, EU Council formations and Commission DGs) to the national and regional levels where the policy is finally tailored and implemented.

This failure is evidenced through the last CAP negotiations, when greening measures became meaningless after being watered down by agriculture decision makers. As a result, taxpayers spend over €16 billion Euro for "greening on paper" without any substantial change in farming practices. This also led to a decrease in the environmental ambition of Pillar 2.

The CAP has also repeatedly failed to deliver for the average farmer. With the biggest share of the budget going to the largest farms (80-20%), most farmers lose out, often those whose land is host to the most biodiversity. This process often culminates in the perverse situation where the 'polluter is paid' rather than the 'polluter pays'. With the right process in place, and the right voices ensuring that public money delivers public goods, the CAP can deliver the objectives we have outlined. (Reference: <http://bit.ly/2LLleR7>)

## QUESTION 13



Which elements of the current CAP are the most burdensome or complex and why?

## OUR RECOMMENDATIONS

This is an open question. We **strongly recommend** the following response:

- While we acknowledge that many aspects of the current CAP create administrative burdens on farmers and governments, an over-simplistic policy would be unable to deliver on the CAP's targets,



nor would it justify the use of public funds. A balance must be struck between the level of complexity for farmers and the delivery of objectives for tax payers. The Einsteinian principle is applicable here: as simple as possible, but no simpler!

Experience has shown that in some instances - such as some advanced level agri-environment schemes - complex management prescriptions, or a need for extensive results monitoring, are perfectly justified considering the high-level environmental targets the schemes deliver on.

There are two main areas of the CAP's first pillar where farmers and NGOs both agree that the current policy is unnecessarily burdensome:

1) Greening payments: the flexibility granted to Member States has made this "simple" policy relatively complex. It is now perceived as burdensome by farmers and paying agencies, while research shows that it is barely delivering for the environment. (Reference: <http://bit.ly/2LLleR7>)

2) Eligibility of pastures for direct payments: livestock farmers using woody pastures and complex land types face high levels of bureaucracy and uncertainty when claiming their pastureland for direct payments, due to increased controls and restrictions based on an over-simplistic assessment of land use. (Reference: <http://bit.ly/2lfsaJw>)

## QUESTION 14

“

The work of the European Commission focuses on 10 priorities for 2014-2020, most of which are relevant to the CAP. Please indicate the most relevant priorities for which the CAP should do more.

## OUR RECOMMENDATIONS

We **strongly recommend** leaving this response blank.



## OUR RATIONALE

We suggest not answering this question given that the Juncker Priorities completely ignore the sustainability question. The new policy should therefore be based on the Sustainable Development Goals (SDGs) which include specific targets (e.g. on biodiversity, poverty, health, etc.) signed by world leaders and all EU heads of state or government. This is outlined further in question 16.

## QUESTION 15

“ Which of the following should be the most important objectives of the CAP?

## OUR RECOMMENDATIONS

We **strongly recommend** selecting the following responses:

- Encouraging the supply of healthy and quality products
- Contributing to a high level of environmental protection across the EU
- Mitigating and adapting to the impact of climate change
- Developing rural areas while taking care of the countryside
- Achieving a balanced territorial development

We are **neutral** on the following responses:

- Ensuring a fair standard of living for farmers
- Securing food supply at reasonable prices for consumers

We recommend **avoiding** the following responses:

- Addressing market uncertainties
- Foster competitiveness and innovation of agriculture

## OUR RATIONALE

Any future policy on food and farming should look at a few key goals as a minimum: how to improve our ecosystems; how to ensure we reach the climate goals of the Paris Agreement; how to provide citizens with healthy and quality products; and, how to make sure we have rural areas that are alive and thriving from all perspectives. We fundamentally do not agree that market uncertainties and competitiveness should be part of a future



CAP, as this type of thinking could lead to further intensification and the need for public intervention to counter the system's unsustainability.

## QUESTION 16

“ Do you see the need to add objectives for a modernised CAP; if yes, which ones?

## OUR RECOMMENDATIONS

This is an open question. We **strongly recommend** the following response:

- Meeting the Sustainable Development Goals: seven out of seventeen SDGs have direct relevance for European agriculture. The CAP is the key tool for meeting these international commitments

Goal 12 requires Europe to achieve the 'sustainable management and efficient use of natural resources' by 2030, while Goal 2 states that we 'ensure sustainable food production systems and implement resilient agricultural practices' as well as 'maintain ecosystems'.

Further, under Goal 15, Europe has committed to reverse land degradation and halt biodiversity loss. Further, Goal 6 also states that by 2020, we must protect and restore water-related ecosystems, including mountains, forests, wetlands, rivers, aquifers and lakes, which are all affected by agricultural production.

Other International agreements:

The Paris Agreement on Climate Change, The Global Convention on Biological Diversity (CBD) & EU air quality laws are all crucial objectives for the next CAP.

## QUESTION 17

“ Do you agree with the following statement: "It makes sense to have a Common Agricultural Policy because we need ..."

## OUR RECOMMENDATIONS

We **strongly recommend** selecting the following responses:

- Common rules, as part of the Single Market (market organisation, trade, competition rules, food safety standards)



- **Largely agree**
- Common objectives to tackle cross-border challenges (food security, environment, climate change, biodiversity...)
- **Largely agree**
- A common budget as it is more efficient
- **Partially agree**
- Economic, social and territorial cohesion and solidarity among Member States
- **Partially agree**
- Common positions at international level making the EU a stronger global actor
- **Partially agree**
- A common framework for sharing best practices, research results, innovative ideas, mutual learning
- **Partially agree**

## OUR RATIONALE

If the objectives are properly set and there is a clear framework for implementation for Member States, it still makes complete sense to have an EU policy which regulates and finances the food and farming system.

## QUESTION 18

“ At which level do you consider that the following CAP objectives should primarily be dealt with?

## OUR RECOMMENDATIONS

We **strongly recommend** selecting the following responses:

- Ensuring a fair standard of living for farmers
  - **leave this answer blank**
- Addressing market uncertainties
  - **leave this answer blank**
- Foster competitiveness and innovation of agriculture
  - **leave this answer blank**
- Securing food supply at reasonable prices for consumers
  - **leave this answer blank**
- Encouraging the supply of healthy and quality products
  - **leave this answer blank**
- Contributing to a high level of environmental protection across the EU



- **EU Level**
- Mitigating and adapting to the impact of climate change
  - **EU Level**
- Developing rural areas while taking care of the countryside
  - **leave this answer blank**
- Achieving a balanced territorial development
  - **leave this answer blank**

## OUR RATIONALE

In most cases, we would need multiple levels to work together to achieve the best result. That is why we advise not answering this question. However, with environment and climate, we find there is a strong case to be made for dealing with them at the EU level: we need EU-wide rules and objectives because these problems do not stay within the borders of one country and less environmentally-minded countries need to be brought up to a common level.

## QUESTION 19

“ Do you agree with the following statements:

## OUR RECOMMENDATIONS

We **strongly recommend** selecting the following responses:

- Farmers need direct income support
  - **Largely disagree**
- Other policies can have a strong impact on agricultural income (e.g. heritage/tax law, social and pension systems)
  - **Largely agree**
- Agricultural policy should deliver more benefits for environment and climate change
  - **Largely agree**
- Targeted investments to foster restructuring and innovation should be supported
  - **Partially disagree**
- Improving farmers' position in value chains (including addressing Unfair Trading Practices)
  - **Partially agree**

## OUR RATIONALE

Looking ahead to the CAP of tomorrow, we do not agree that farmers need income support without any rules attached. Many sectors in society have difficulties and they do not get income support from the government to stay in business. Instead, farmers should get support from society to engage in truly sustainable farming. This is similar to the element of targeted support for restructuring and innovation. Depending on how you restructure or how you innovate, you can either create a living countryside or one that is depopulated and without wildlife. We can more or less agree with the other options.

## QUESTION 20

“ Do you think that the following actions under the CAP could improve the competitiveness of farmers?

## OUR RECOMMENDATIONS

We **strongly recommend** selecting the following responses:

- Supporting the development of futures markets
  - **Partially disagree**
- Enhancing transparency in the agricultural markets
  - **Largely agree**
- Supporting the integration of farmers in Producer Organisations
  - **Don't know**
- Support for Research & Innovation
  - **Partially disagree**
- Simplifying administrative procedures
  - **Largely disagree**

## OUR RATIONALE

The competitive farmer will be the farmer who has taken care of his or her farm's natural resources and as a result can still produce food over the long term. Therefore, we think that it is problematic that this is not given as an option in the question. From the (limited) suggested answers, the one related to market transparency is the only option which therefore partially answers the question. We understand that simplifying administrative procedures has little to do with competitiveness.



## QUESTION 21

“ Which of the following criteria are most relevant when allocating direct support?

## OUR RECOMMENDATIONS

We **strongly recommend** selecting the following responses:

- Compensation to farming activities in Areas with Natural Constraints/ High Nature Value Areas
- Practices with the highest environmental/climate benefits
- Limit in support for large beneficiaries (capping)

We are **neutral** on the following responses:

- Specific products and/or sectors
- Linkage to standards (e.g. food safety, labour)
- An equal level of support for farmers within the same territory
- Small producers
- Young Farmers

We recommend **avoiding** these responses:

- Risk managements tools
- Territories with higher agricultural potential

## OUR RATIONALE

The first question to ask should be: is direct income support to farmers still relevant and what are the objectives of this support? In our view, direct support can only be justified if it is tied to strict social or environmental criteria such as those for effectively reaching environmental goals. Direct support could also be used to support farmers in areas with natural constraints (ANC) based on strict management requirements. Under no circumstances should money just be distributed because you happen to live in a specific area. What is clear is that if direct support is to continue, it should be capped to avoid large sums of money ending up in only a few pockets. In contrast, capping would not be necessary if payments were made for specific environmental or social deliverables.

## QUESTION 22

“ Which actions could further improve the EU export performance?

### OUR RECOMMENDATIONS

We **strongly recommend** selecting the following response:

- No action needed

### OUR RATIONALE

We believe that the focus of the CAP should be providing good, healthy and sustainable food for the people in Europe. Export performance is not part of that.

## QUESTION 23

“ Considering consumer and wider societal demands, where can the linkage between CAP and standards be improved?

### OUR RECOMMENDATIONS

We recommend **selecting three** of the following responses:

- Food safety standards
- Human nutrition standards and guidelines
- Standards for fair trade products
- Standards for organic products
- Environmental and climate standards
- Standards for the use of antimicrobials/pesticides
- Animal and plant health standards
- Animal welfare standards
- Labour Standards

### OUR RATIONALE

There is definite room to improve the links between the CAP and all of the standards. We have put all standards on an equal footing in our response as we believe no standard can be prioritised over another. Please take the



opportunity to underline areas that are hardly mentioned in the rest of the questionnaire.

## QUESTION 24

“ When it comes to meeting higher production standards, do you agree with the following statements?

## OUR RECOMMENDATIONS

We **strongly recommend** leaving this response blank.

## OUR RATIONALE

A good CAP would require a sound combination of mandatory rules, voluntary incentives and support for more informed consumer choices. The options on offer are phrased in a very misleading way, therefore we have not ticked any boxes. For example, voluntary incentives such as agri-environmental schemes should pay farmers for engagements going beyond the legal base line; they should not ever be seen as an alternative to the legal baseline. Similarly we cannot support the notion that any increased standards must be compensated (e.g. if a pesticide is found to be dangerous, it should be banned and you can't expect tax payers to provide compensation for it).

## QUESTION 25

“ For which of the following environmental protection objectives should the CAP do more?

## OUR RECOMMENDATIONS

We **strongly recommend** selecting the following responses:

- Prevention and reduction of water pollution (pesticides, fertilisers)
- Prevention of biodiversity loss

We also recommend **selecting one** of the following responses:

- Sustainable use of water
- Prevention of environmental risks such as floods



- Prevention and reduction of soil erosion
- Avoiding soil salinization, compaction and desertification
- Contribution to the Air Quality Plans

## OUR RATIONALE

This question is misleading since it is asking the respondent to choose between objectives rather than checking how these objectives should be met. We have chosen biodiversity since it is such an overarching objective: i.e. to avoid biodiversity loss, you need to address all other factors too. For instance, water pollution is a major concern across Europe, as is water scarcity in countries with drier climates.

## QUESTION 26



Which are the most important objectives for the CAP to better address climate change?

## OUR RECOMMENDATIONS

We **strongly recommend** selecting the following responses:

- Reducing Green House Gas (GHG) emissions in the agricultural sector
- Improving climate change adaption and enhancing the resilience of agricultural production systems

We are **neutral** on the following responses:

- Fostering carbon conservation and sequestration in agriculture and forestry
- Promoting diversification of farming systems
- Promoting research to address plant and animal diseases linked to climate change

We recommend **avoiding** the following responses:

- Promoting afforestation and sustainable forest management
- Providing sustainable renewable energy resources



## OUR RATIONALE

Any future policy must take the climate seriously. This needs to involve both mitigation - ensuring that the agricultural sector is reducing its overall emissions - and adaptation, including building resilient socio-ecological systems. Diversifying farming systems and conserving carbon in soils are two tools for the aforementioned objectives.

## QUESTION 27

“ In which of the following areas do you consider that the CAP should strengthen its support to sustainable forest management?

## OUR RECOMMENDATIONS

We **strongly recommend** selecting the following responses:

- Forest fire prevention and restoration
- Increase of the resilience and protection of forest ecosystems
- Agroforestry systems

We are **neutral** on the following response:

- Prevention of natural disasters and catastrophic events in forests such as pest or storms

We recommend **avoiding** the following responses:

- Mobilisation of forest biomass for the production of material and energy
- Afforestation/reforestation

## OUR RATIONALE

Sustainable forest management should make our forests resilient and our ecosystems healthy. Forest fire prevention and restoration actions can greatly benefit from the participation of farmers (e.g. grazing or firebreaks) and land managers. And agroforestry systems are a variety of sustainable integrated land uses, from traditional wood pastures to modern alley cropping systems which generally have beneficial effects on soil, water and climate. The other options have too often been seen as damaging instead of helpful to sustainable forest management.



## QUESTION 28

“ Where should the CAP improve its contribution for rural areas?

### OUR RECOMMENDATIONS

We **strongly recommend** selecting the following responses:

- Enhancing the interplay between local production and local markets
- Enhancing quality of life and social inclusion of rural inhabitants
- Strengthening governance and local development through bottom-up initiatives such as LEADER
- Fostering rural tourism and recreation, including through the provision of landscapes benefits, cultural values and traditional local food

We are **neutral** on the following responses:

- Fostering innovation through knowledge transfer, advice and vocational training
- Taking care of local know-how and products in line with EU's diversity and providing the basis for EU quality products
- Addressing local needs by supporting the provision of local infrastructure/services (e.g. health care, child care, transport)
- Fostering the economic viability of agriculture throughout the EU, avoiding concentration of production and people in certain areas
- Creating and maintaining jobs in rural areas, including in primary agricultural production
- Providing connectivity and digital solutions
- Contributing to societal and cultural capital for rural areas to stay vital living spaces and to establishing mutually beneficial rural-urban linkages
- By helping SMEs to create jobs in rural areas

### OUR RATIONALE

There remains a great need for a future policy to invest in rural areas so as to ensure the social, environmental and economic viability of rural areas in Europe. The four elements ticked green must be key elements of a future policy, but the others should not be ignored either.



## QUESTION 29

“ How can the CAP better help young farmers or other young rural entrepreneurs?

## OUR RECOMMENDATIONS

We **strongly recommend** selecting the following responses:

- Supporting knowledge transfer, advice and vocational training
- Supporting new forms of cooperation

We are **neutral** on the following responses:

- Supporting business start-up
- Providing transitional top-up payments to young farmers
- Improving access to financial instruments
- Putting in place incentives to stimulate the cooperation between different generations

We recommend **avoiding** the following responses:

- Providing more support for investments
- Incentivising the transfer of farms

## OUR RATIONALE

It is important to have more new entrants into the field of agriculture. The focus should not be on the age of the farmer, but rather on the willingness of the new entrant to engage actively in sustainable food and farming. Therefore the focus should first lie on innovative ways of cooperation and on knowledge. Related to the CAP, we see that the biggest obstacle to people starting a sustainable farm is high land costs, inflated by the CAP first pillar subsidies.

## QUESTION 30

“ What would be the best way to encourage innovation?



## OUR RECOMMENDATIONS

We **strongly recommend** selecting the following response:

- Improve the technical competence and impartiality of advisory services

We are **neutral** on the following responses:

- Support the engagement of farmers in innovative projects
- Address the knowledge gap amongst farmers
- Support knowledge exchange through better access to advisory services, networking among farmers and demonstration farms
- Develop IT infrastructure for knowledge exchange
- Provide better access to finance / investment

## OUR RATIONALE

To encourage innovation, the main focus should be put on a proper advisory service that is technically up-to-date and delivers information in an impartial way. The other options could also be ticked but are secondary to the advisory option.

## QUESTION 31

“ Do you think the CAP could be simpler if:

## OUR RECOMMENDATIONS

We **strongly recommend** selecting the following responses:

- Overlaps between Rural Development and other CAP Measures would be reduced
  - **Largely agree**
- Databases and technologies (remote sensing, smart phones) were better used to reduce the incidence of farm inspections
  - **Don't know**
- E-government services were more extensively used
  - **Don't know**
- Lump-sum approaches were extended
  - **Largely disagree**



- More choice was given to farmers in terms of environmental measures
  - **Partially disagree**

## OUR RATIONALE

The only option for simplifying the CAP that seems reasonable here is the one focused on reducing overlaps between both pillars. For a more elaborate answer on the need for simplification, see question 32.

## QUESTION 32

“ Do you have concrete ideas for simplifying the CAP and reducing the administrative burden for farmers, beneficiaries (or public administrations)? Please specify and explain the reasons behind your suggestions.

## OUR RECOMMENDATIONS

This is an open question. We **strongly recommend** the following response:

- The new policy should first and foremost be fit for purpose. That means it should be effective, efficient, relevant and coherent with other policies and show EU added value.

Simplification for the sake of simplification, and without looking at how well the policy achieves its goals, is nonsensical. Simplification should ensure that public benefits are achieved effectively and efficiently.

However, we do agree that the current CAP is burdensome for beneficiaries, administration and from a perspective of citizens interested to understand what value they get for their taxes.

We often see that complications are derived from the many exemptions and loopholes created to dodge the official goal of the policy. Clear examples can be found in our answer on question 13.

For beneficiaries, administrations or citizens alike, the current policies are very complicated to understand, to apply for or to implement at national level. The easiest way to simplify the policy is



therefore to abolish the parts of the CAP that are no longer justified (e.g. specifically first pillar payments without any requirements attached to them) and refocus the budget and effort on targeted, smart, well planned and monitored measures or contracts that have clear objectives. A real effort should be put on making them work not just at the policy level but also on the ground. More specific proposals are outlined in question 33.

## QUESTION 33

“ Do you have more ideas for modernising the CAP?

## OUR RECOMMENDATIONS

This is an open question. We **strongly recommend** the following response:

- A modern CAP should start with a fundamental shift away from the current 2 pillars approach. Area based payments supporting unsustainable practices should cease and the 'Polluter pays' principle should be the guiding principle. The priority should be on the full implementation of environmental legislation, as well as legislation on related issues such as animal welfare and health, coupled with taxing pollution. The CAP should also contain payments for ecosystems services. Concretely, this could take a programmatic approach, building on and developing the existing LIFE approach: rewarding concrete results with payments. Such environmental payments should be managed or at least overseen by environmental authorities.

Furthermore, the new CAP should help prevent land abandonment where it would have negative social and environmental impacts. It would need to have clear environmental goals. Special attention should also be given to the production of nutritious food and the promotion of healthy diets, which is currently not the case. This could be achieved by setting up short supply chain mechanisms, nutritional education in schools and local projects in urban areas.

Finally, special attention should be given to transition: the new policy should help farmers who have invested in unsustainable farming models to move towards sustainable ones. This should be limited in time.



## QUESTION 34

“ Please feel free to upload a concise document (maximum 5 pages), such as a position paper. The maximal file size is 1MB.

## OUR RECOMMENDATIONS

This is an open question. We encourage all organisations to upload their own vision document or position paper.

