

Open letter to Members of the European Parliament's Committee on Agriculture and Rural Development (AGRI) voting on the CAP Reform on the 2nd & 8th April 2019

Dear AGRI Members,

The undersigned civil society organisations representing organic farmers, environmental protection, animal welfare, development, food and health interests are concerned about the upcoming vote on the Common Agricultural Policy (CAP) scheduled for 2 April and would like to draw your attention to several issues which we request you to take up.

Today's CAP represents 36% of the EU's budget and impacts on farmers' livelihoods and the economic condition of rural communities. Moreover, every euro we spend on the CAP affects the water we drink, the food we eat, the air we breathe, the landscapes and the biodiversity of our countryside, the welfare of farm animals, our climate and finally peoples' lives in third countries. Considering the significant budget it represents, Europeans expect the CAP to contribute to a better future and to meet our economic, societal, environmental and climate challenges.

Because the CAP impacts on so many facets of EU citizens' lives, different committees of the European Parliament (BUDG, CONT, DEVE, ENVI, FEMM, REGI) have prepared their opinions on the future orientation of the CAP. The Committee on the Environment, Public Health and Food Safety (ENVI) has a particularly relevant position on the CAP strategic plans regulation, for which it shares competence on certain articles with the AGRI Committee.

Europe's citizens expect the CAP to deliver in an even-handed way on its varied objectives. We are closely watching the reform process and will publicly oppose any measures adopted in the Parliament by the AGRI Committee that contradict the policy objectives that the CAP intends to serve. At the upcoming AGRI Committee vote, we urge you to support our 5 key demands by voting for the most important amendments adopted by the European Parliament committees that delivered Opinions on the CAP, which we identify below.

We expect you to represent and defend public and societal interests, and those of all farmers, not just a fraction of them, and will be closely monitoring the outcome of the vote.

Yours sincerely,

Friends of the Earth Europe – Stanka Becheva, Food & Farming Campaigner

BirdLife Europe – Harriet Bradley, EU Agriculture and Bioenergy Policy Officer

Arche Noah – Seed Savers Association in Central Europe – Gonçalo Macedo, Agriculture Policy Coordinator

Compassion in World Farming – Olga Kikou, Head of EU Office

European Public Health Alliance – Nikolai Pushkarev, Policy coordinator – food, drink & agriculture

SAFE-Safe Food Advocacy Europe – Bruno Menne, Policy Officer and Project Coordinator

BeeLife European Beekeeping Coordination – Cindy Adolphe, Research and policy officer

Slow Food Europe – Cristina Agrillo, Policy officer

Humane Society International/Europe – Alexandra Clark, Campaign Manager

IFOAM EU – Eric Gall, Deputy Director and Policy Manager

WWF-European Policy Office – Jabier Ruiz, Senior Policy Officer - Agriculture and Food

Pesticide Action Network Europe – Henriette Christensen, Senior policy officer

Act Alliance EU – Karin Ulmer, Senior Policy Officer, Food security

Greenpeace European Unit – Marco Contiero, EU Policy Director on Agriculture

Four Paws-Vier Pfoten – Andreas Manz, EU Farm Animal Policy Coordinator

European Environmental Bureau – Bérénice Dupeux, Policy Officer for Agriculture



Specific Requests

1. **Set clear and rigorous objectives holding Member States (MS) accountable: make the specific objectives and associated indicators meaningful to properly address the current environmental and societal challenges, including negative impacts beyond Europe's borders**

As voted in opinion-giving committees, we urge you to also vote for:

- DEVE: introducing a new CAP objective, systematically taking into account the objectives of development cooperation and avoiding negative external impacts of the Union's policies on developing countries and their populations [DEVE: AM 50];
- ENVI & REGI & DEVE:
 - Ensuring that climate specific objectives aim at GHG reductions in line with the Paris Agreement, the sequestration of carbon in the soil and which do not include biofuel production [ENVI: AM 62, DEVE: AM 47, REGI: AM 56];
 - Clarifying that CAP environmental objectives shall contribute to the protection and improvement of air and water quality, promoting a more sustainable use of water and soil, while reducing pesticide use [ENVI: AM 62, DEVE: AM 51];
 - Introducing a biodiversity specific objective that aims to reverse the loss of pollinators and support high nature value farming [ENVI: AM 62, DEVE: AM 51];
- ENVI:
 - Introducing the definition of 'stocking density' and that of 'concentrated animal feeding operations' (CAFOs) [ENVI: AM 53, AM 54]; Focusing the societal objectives on the development of organic agriculture, the reduction of food waste, the prevention of antimicrobial resistance and the enhancement of animal welfare [AM 62];
 - Requiring Member States to indicate their respective contribution to the specific objectives [AM 62];
 - Ensuring that changes to the specific objectives are reflected in Annex I, by adding for instance new indicators such as that on reversing pollinator decline such as a Pollinator Index [AM 179, AM 183, AM 184, AM 185, AM 188].

2. **Require MS to define targets in relation to the Impact Indicators that reflect actual progress on the ground**

As voted in the opinion-giving committees, we urge you to vote in favour of the following:

- ENVI:
 - Include results indicators on reducing livestock density and decreasing the number of violations of animal welfare legislation [AM 188];
 - Articles 3 [ENVI: AM 56], 7 [ENVI: AM 63], 91 [ENVI: AM 141], 92 [ENVI: AM 142] and 97 [ENVI: AM 148] include specific references to setting targets for both result and impact indicators;
 - Assessing the level of "Increased ambition with regard to environmental- and climate-related objectives" (Article 92) using impact indicators, and

this should be accompanied by an obligation to increase CAP expenditure in support of organic farming [ENVI: AM 142];

- Member States to include in CAP Strategic Plans an analysis of their organic production and expected future demand, the sector's potential to fulfil CAP objectives, and accordingly they shall determine the appropriate level of support towards organic [ENVI: AM 71];
- Make pesticide dependency an impact indicator [AM 188] and adding the pesticide regulation in annex XI of environmental laws to be respected [AM 199].

The AGRI Committee should go beyond the initial improvements introduced by ENVI by including an impact indicator focused on increasing access to fruit and vegetables. This would require CAP strategic plans to pursue increased fruit and vegetables consumption for healthier and more sustainable diets.

3. Ring-fence 70% of the CAP budget for the specific objectives *d, e, f* and *i*, and 50% for environmental interventions, including specific funding for biodiversity

As voted in the opinion-giving committees, we urge you to also vote for:

- ENVI:
 - Increasing the share of the second pillar budget for the climate and environment to at least 40% [AM 136];
 - Introducing a 30% ring-fencing of direct payments for eco-schemes [AM 82, AM 136];
 - Allocate specific funding for biodiversity within environmental ring-fencing [AM 43; AM 136];
 - Moving payments for areas with natural or specific constraints to the first Pillar of the CAP [AM 83, AM 127];
 - Ensuring that transfers between direct payments allocations and EAFRD allocations go only from pillar 1 to pillar 2 [AM 140];
 - Ensuring that direct payments are not used to finance concentrated animal feed operations (CAFOs) [AM 76];
 - Preventing coupled support for livestock to farms going beyond a defined maximum livestock stocking density [AM 85];
 - Ensuring that coupled support for ruminants may only be allowed when animals are raised in a grass-fed, pasture-based grazing system and with significantly higher environmental or animal welfare results [AM 91];
 - National Strategic Plans must ensure that by the end of the strategic plan programming period, the total livestock stocking density per Member State does not exceed 0.7 livestock units per hectare [AM 92];
 - Increasing support to leguminous crop production in order to decrease dependency on concentrated feed mix containing soya, especially imported soya originating from land that has recently been deforested or converted, in line with the SDG 15 [AM 121].
- DEVE:
 - Limiting the financial allocations for the coupled income support interventions to a maximum of 5% of the amounts (set out in Annex VII) [AM 66] and using them to create a Union-wide leguminous strategy

aimed at decreasing import dependency on soy and animal feed from third countries [AM 21];

- Independent scientific studies [AM 68] will be the basis for the climate tracking methodology to be applied on CAP expenditure [AM 69].

4. Ensure a new enhanced conditionality and its enforcement

As approved by the ENVI Committee, we urge you to support the following:

- Keep the GAECs proposed by the European Commission, improving:
 - The introduction of a new GAEC on “Maximum stocking density.” for livestock farms [AM 190];
 - The strengthening of the GAEC on “Crop rotation” including a minimum four years rotation with leguminous crops and avoiding bare soil [AM 192];
 - The introduction of 3 metre pesticide and fertiliser free buffer strips to protect water streams [AM 191];
 - Devoting 7% of farmland to pesticide-free (non-productive) areas [AM 193];
 - The compulsory introduction of the Farm Sustainability tool by the European Commission and the reinforcement of the input reduction by ENVI [AM 191];
 - The introduction of a new GAEC on animal welfare ensuring that animals are “able to stand up, turn around, and extend their limbs.”[AM 198];
- Improving the proposed SMRs proposed by the European Commission while adding all newly introduced SMRs, especially:
 - New SMR related to the Veterinary Medicines Regulation [ENVI: AM 194];
 - New SMRs related to both directives on poultry welfare and the directive on slaughter [ENVI: AM 198];
 - Improving SMR 12 relating to pesticides by adding reference to article 67 recalling farmers need to register their pesticides use and improving SMR 13 relating to the EU Directive on Sustainable Use of Pesticides by adding reference to article 14 recalling that farmers are obliged to apply integrated pest management [ENVI: AM 197].

5. Improve governance and ensure that the existing European code of conduct on partnership is applied in the CAP Strategic Plans’ Regulation in order to allow the involvement of health and environmental authorities and civil society in the design of national plans

As adopted by the opinion-giving committees, we urge you to support the following:

- The body of the MS responsible for drafting the CAP Strategic Plans shall ensure that the competent authorities for development cooperation are effectively involved in drawing up and monitoring the implementation of the CAP Strategic Plan to streamline it with the development cooperation policy of the Member State and the Union [ENVI: AM 135; AM 162, DEVE: AM 70];

- Relevant bodies representing the interests of civil society, such as NGOs and partners from third countries shall be involved in the preparation of the CAP Strategic Plans [ENVI: AM 143, AM 161, DEVE: AM 73];
- The outcome of the consultation with partners will include a documentation of comments submitted and whether and how these comments have been taken into account by the managing authority [REGI: AM 172];
- All 8 annexes of a Member State's CAP Strategic Plan shall be subject to approval by the European Commission [ENVI: AM 157];
- Making the CAP Strategic Plans public, both at their draft stage and after their approval [ENVI: AM 94, AM 161];
- Improved governance as concerns reducing conflicts of interest in the design of the CAP at European and national level [ENVI AM 162].